

EPA Registration No.
70506-93
vol. 1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

SEP 20 2005

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

United Phosphorus Inc.
c/o Michael Kellogg
Pyxis Regulatory Consulting
4110 136th St. N.W.
Gig Harbor, WA 98332

Gentlemen:

Subject: Add New Uses and Revised Labeling
Clopyralid Technical
EPA Registration No 70506-93
Your Submission Dated September 8, 2005

The amendment referred to above, submitted in connection with registration under section 3(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable provided that you:

1. Submit/cite all data required for registration/reregistration of your product under FIFRA section 3(c)(5) or 4(a) when the Agency requires all registrants of similar products to submit such data.

2. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

- The Conditions of Sales and Limited Warranty section is unacceptable since it only warrants the chemical description on the label. This negates the directions for use and precautionary statements required on pesticide labeling by FIFRA. Refer to the enclosed 1966 PR Notice for acceptable statements.

3. Submit one (1) copy of your final printed labeling before you release the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

-2-

If you have any questions concerning this letter please contact Mr. James Stone at 703-305-7391.

Sincerely yours,

Joanne I. Miller

Joanne I. Miller
Product Manager (23)
Herbicide Branch
Registration Division (7505C)

Enclosure

Clopyralid Technical

ACTIVE INGREDIENT:

Clopyralid: 3,6-dichloro-2-pyridinecarboxylic acid..... 96.0%

INERT INGREDIENTS: 4.0%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN DANGER

| FIRST AID | |
|---|---|
| If in eyes: | <ul style="list-style-type: none">• Hold eye open and rinse slowly with a steady, gentle stream of water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or physician for treatment advice. |
| If swallowed: | <ul style="list-style-type: none">• Call a physician or poison control center immediately for treatment advice.• Have person sip a glass of water if able to swallow.• DO NOT induce vomiting unless told to do so by poison control center or physician.• Do not give anything by mouth to an unconscious person. |
| If inhaled: | <ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably, mouth-to-mouth, if possible.• Call a poison control center or physician for treatment advice. |
| If on skin or clothing: | <ul style="list-style-type: none">• Take off contaminated clothing.• Wash skin with plenty of water for 15-20 minutes.• Call a poison control center or physician for treatment advice. |
| Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage. Have the product container or label with you when calling a poison control center or doctor, or going for treatment. | |
| For chemical emergency: spill, leak, fire, exposure or accident, call CHEMTREC at 1-800-424-9300. | |

See side panel for additional precautionary statements.

Manufactured For:

United Phosphorus, Inc.
423 Riverview Plaza

Trenton, NJ 08611

1-800-247-1557 • www.upi-usa.com

EPA Reg. No. 70506-93

EPA Est. No.

Net Weight:

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

SEP 20 2005

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

70506-93

PRECAUTIONARY STATEMENTS
Hazard to Humans and Domestic Animals
DANGER

Corrosive. Causes irreversible eye damage. Harmful if absorbed through skin or inhaled. Do not get in eyes or on skin and clothing. Wear goggles or face shield when handling. Avoid breathing dust. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product may only be formulated into manufacturing-use herbicide products or end-use herbicide products for the following uses:

Agricultural Uses

Asparagus, barley, broccoli, broccoli raab, Brussels sprouts, cabbage, canola, cauliflower, Chinese cabbage, Chinese broccoli, collards, corn, fallow land, garden beets, grasses, kale, kohlrabi, mint, mizuna, mustard greens, mustard spinach, oats, pasture, rangeland, rape greens, spinach, stone fruits, sugar beets, tree plantations, turnips, and wheat. This product may be used to formulate products for specific use(s) not listed on this label, except residential turf, if the formulator, user group or grower has complied with U.S. EPA submission requirements regarding the support of such use(s). Consult United Phosphorus, Inc. for instructions for formulation and other information.

Non-Agricultural Uses

For manufacture of herbicides for use only on non-residential turf such as athletic and recreational sports fields, cemeteries, golf courses, industrial manufacturing and storage sites, non-cropland, parks, rights-of-way, sod farms and roadsides; grass grown for seed; select ornamental plantings in landscapes and nurseries, forest sites; CRP acres. This product may be used to formulate products for specific use(s) not listed on this label, except residential turf, if the formulator, user group or grower has complied with U.S. EPA submission requirements regarding the support of such uses(s). Consult United Phosphorus, Inc. for instructions for formulation and other information.

This product must not be formulated into manufacturing-use products or end-use products for use on residential turf.

If the product is labeled for reformulation into products bearing labeling for turf applications other than residential turf, the formulated product label must contain the following statements:

- Do not use on residential turf
- Do not send clippings to a compost facility
- Do not collect grass clippings for mulch or compost
- Applicator must give notice to landowners/property managers to not use grass clippings for composting.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE

Store in a cool, dry, well-ventilated area.

PESTICIDE DISPOSAL

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL

Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by procedures approved by state and local authorities.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

United Phosphorus, Inc. warrants that at the time of delivery, this product will conform to its chemical description on the label, that it will pass without objection in the trade under the contract description, that the seller will convey title hereto, and that such product will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. UNITED PHOSPHORUS, INC. EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. BUYER ACKNOWLEDGES THE USE OF ITS OWN INDEPENDENT SKILL AND EXPERTISE IN THE SELECTION AND USE OF THE PRODUCT AND DOES NOT RELY ON ANY ORAL OR WRITTEN STATEMENTS OR REPRESENTATIONS.

Fee for Service



This package includes the following

- ☐ New Registration
- ☒ Amendment

☐ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: ____

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. **23**

Receipt No.

S- **784063**

EPA File Symbol/Reg. No.

70506-93

Pin-Punch Date:

9/9/05

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$ ____

Parent/Child Decisions:

Reviewer: J. Miller

Date: 9-13-05

Remarks:

NON - FEE



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

September 15, 2005

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MICHAEL KELLOGG
UNITED PHOSPHORUS INC
423 RIVERVIEW PLAZA
TRENTON, NJ 08611

PRODUCT NAME: AGVALUE CLOPYRALID TECHNICAL
COMPANY NAME: UNITED PHOSPHORUS INC
EPA FILE SYMBOL: 70506-93
EPA RECEIPT DATE: 09/09/05

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 23, at (703) 305-6224.

Sincerely,

A handwritten signature in blue ink, which appears to read "Julie", is placed below the word "Sincerely,".

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

| | | |
|---|---|--|
| 1. Company/Product Number 70506-93 | 2. EPA Product Manager J. Miller | 3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name) United Phosphorus, Inc. / Clopyralid Technical | PM# 23 | |
| 5. Name and Address of Applicant (Include ZIP Code) United Phosphorus, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address | 6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____ | |

Section - II

| | |
|--|--|
| <input checked="" type="checkbox"/> Amendment - Explain below. | <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ |
| <input type="checkbox"/> Resubmission in response to Agency letter dated _____ | <input type="checkbox"/> "Me Too" Application. |
| <input type="checkbox"/> Notification - Explain below. | <input type="checkbox"/> Other - Explain below. |

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of label amendment to add additional uses. The additional uses added to the enclosed Clopyralid Technical label appear on United Phosphorus, Inc.'s Clopyr Ag (EPA Reg. No. 70506-94) label approved by the Agency on June 3, 2005. As no data are submitted with this amendment, nor will data need to be reviewed to approve the proposed labeling, United Phosphorus, Inc. believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act of 2003. Please email fees@PyxisRC.com if there are any questions.

Section - III

| | | | | | |
|---|--|---|-------------------|---|--|
| 1. Material This Product Will Be Packaged In: | | | | 2. Type of Container | |
| Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | <input type="checkbox"/> Metal | |
| * Certification must be submitted | | If "Yes" Unit Packaging wgt. | No. per container | <input type="checkbox"/> Plastic | |
| | | If "Yes" Package wgt | No. per container | <input type="checkbox"/> Glass | |
| | | | | <input type="checkbox"/> Paper | |
| | | | | <input type="checkbox"/> Other (Specify) _____ | |
| 3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container | | 4. Size(s) Retail Container | | 5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product | |
| 6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled | | | | <input type="checkbox"/> Other _____ | |

Section - IV

| | | | |
|--|------------------------------|---|---|
| 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.) | | | |
| Name Michael Kellogg | Title Agent | Telephone No. (Include Area Code) (253) 853-7369 | |
| Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. | | | 6. Date Application Received (Stamped) |
| 2. Signature | 3. Title Agent | | |
| 4. Typed Name Michael Kellogg | 5. Date September 8, 2005 | | |

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

September 8, 2005

COURIER DELIVERY

Joanne Miller (PM 23)
Document Processing Desk (AMEND)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1801 Bell Street
Arlington, VA 22202-4501

RE: United Phosphorus, Inc. – Clopyralid Technical (EPA Reg. No. 70506-93)
Application for a New Pesticide Registration

Dear Ms. Miller,

On behalf of United Phosphorus, Inc. we are submitting an amended label for Clopyralid Technical (EPA Reg. No. 70506-93) to add various crop and non-crop use sites. In support of this amendment, we submit the following documents:

1. Application for Amended Registration (EPA Form 8570-1)
2. One (1) copy of the Clopyralid Technical amended label with tracked changes [Editors Note: Added text is underlined and deleted text is denoted by ~~strike-through~~]
3. Five (5) copies of the Clopyralid Technical amended label with changes incorporated
4. Certification with Respect to Citation of Data (EPA Form 8570-34)
5. Agency Internal Use Copy of the Data Matrix
6. Public File Copy of the Data Matrix
7. Letter of Authorization from Albaugh, Inc.

The additional uses added to the enclosed Clopyralid Technical label appear on United Phosphorus, Inc.'s Clopyr Ag (EPA Reg. No. 70506-94) label approved by the Agency on June 3, 2005. As no data are submitted with this amendment, nor will data need to be reviewed to approve the proposed labeling, United Phosphorus, Inc. believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act of 2003.

We trust you will find this application complete. However, please feel free to contact me if you have any questions or need any additional information.

Sincerely,



Michael Kellogg

Enclosures

cc: Ann Tillman; United Phosphorus, Inc.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.29 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

| | |
|---|---|
| Applicant's/Registrant's Name, Address, and Telephone Number United Phosphorus, Inc.; 423 Riverview Plaza, Trenton, NJ 08611; (253) 853-7369 | EPA Registration Number/File Symbol 70506-93 |
| Active Ingredient(s) and/or representative test compound(s) Clopyralid | Date September 8, 2005 |
| General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial Food Crop, Terrestrial Nonfood Crop | Product Name Clopyralid Technical |

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

| | |
|---|--|
| <input checked="" type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose). | <input type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used). |
|---|--|

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

| | | |
|---------------|----------------|---|
| Signature | Date 9/8/05 | Typed or Printed Name and Title Michael Kellogg; Agent |
|---------------|----------------|---|




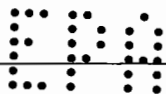
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

| | | | | | |
|---|--|----------------------|--|--------|---------------------------|
| Date September 8, 2005 | | | EPA Reg No./File Symbol 70506-93 | | Page 1 of 5 |
| Applicant's/Registrant's Name & Address United Phosphorus, Inc. 423 Riverview Plaza Trenton, NJ 08611 | | | Product Clopyralid Technical | | |
| Ingredient Clopyralid | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| Product Specific Data Requirements | | | | | |
| 830.1550 | Product Identity and Composition | 45751501 45755601 | United Phosphorus, Inc. | OWN | See endnote ¹ |
| 830.1600 | Description of Materials Used to Produce the Product | 45751501 45755601 | United Phosphorus, Inc. | OWN | See endnote ¹ |
| 830.1620 | Description of Production Process | 45751501 45755601 | United Phosphorus, Inc. | OWN | See endnote ¹ |
| 830.1650 | Description of Formulation Process | | | | Not required ² |
| 830.1670 | Discussion of Formation of Impurities | 45751501 45755601 | United Phosphorus, Inc. | OWN | See endnote ¹ |
| 830.1700 | Preliminary Analysis | 45751502 | United Phosphorus, Inc. | OWN | See endnote ¹ |
| 830.1750 | Certified Limits | 45751501 45755601 | United Phosphorus, Inc. | OWN | See endnote ¹ |
| 830.1800 | Enforcement Analytical Method | 45751502 | United Phosphorus, Inc. | OWN | See endnote ¹ |
| 830.6302 | Color | 45751503 45751504 | United Phosphorus, Inc. | OWN | See endnote ¹ |
| 830.6303 | Physical State | 45751503 45751504 | United Phosphorus, Inc. | OWN | See endnote ¹ |
| Signature  | | | Name and Title Michael Kellogg, Consultant | | Date 9/8/05 |



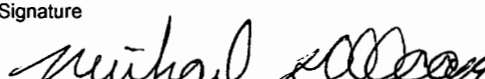
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

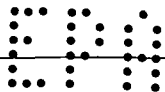
401 M Street, S.W.

WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

| | | | | | |
|--|---|----------------------|---|--------|---------------------------|
| Date September 8, 2005 | | | EPA Reg No./File Symbol 70506-93 | | Page 2 of 5 |
| Applicant's/Registrant's Name & Address United Phosphorus, Inc. 423 Riverview Plaza Trenton, NJ 08611 | | | Product Clopyralid Technical | | |
| Ingredient Clopyralid | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 830.6304 | Odor | 45751503 45751504 | United Phosphorus, Inc. | OWN | See endnote ¹ |
| 830.6313 | Stability to Normal and Elevated Temperatures, Metals, and Metal Ions | 45751503 45751504 | United Phosphorus, Inc. | OWN | See endnote ¹ |
| 830.6314 | Oxidation/Reduction: Chemical Incompatibility | | | | Not required ³ |
| 830.6315 | Flammability | | | | Not required ³ |
| 830.6316 | Explosibility | | | | Not required ³ |
| 830.6317 | Storage Stability | | | | Not required ³ |
| 830.6319 | Miscibility | | | | Not required ³ |
| 830.6320 | Corrosion Characteristics | | | | Not required ³ |
| 830.6321 | Dielectric Breakdown Voltage | | | | Not required ³ |
| 830.7000 | pH | 45751503 45751504 | United Phosphorus, Inc. | OWN | See endnote ¹ |
| 830.7050 | UV/Visible Absorption | 45751503 45751504 | United Phosphorus, Inc. | OWN | See endnote ¹ |
| 830.7100 | Viscosity | | | | Not required ³ |
| 830.7200 | Melting Point/Melting Range | 45751503 45751504 | United Phosphorus, Inc. | OWN | See endnote ¹ |
| Signature  | | | Name and Title Michael Kellogg, Consultant | | Date 9/8/05 |




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

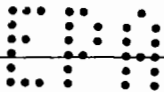
401 M Street, S.W.

WASHINGTON, D.C. 20460

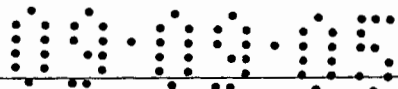
Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

| | | | | | |
|--|--|----------------------|---|--------|---------------------------|
| Date September 8, 2005 | | | EPA Reg No./File Symbol 70506-93 | | Page 3 of 5 |
| Applicant's/Registrant's Name & Address United Phosphorus, Inc. 423 Riverview Plaza Trenton, NJ 08611 | | | Product Clopyralid Technical | | |
| Ingredient Clopyralid | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 830.7220 | Boiling Point/Boiling Range | | | | Not required ⁴ |
| 830.7300 | Density/Relative Density/Bulk Density | 45751503 45751504 | United Phosphorus, Inc. | OWN | See endnote ¹ |
| 830.7370 | Dissociation Constants in Water | 45751503 45751504 | United Phosphorus, Inc. | OWN | See endnote ¹ |
| 830.7550 | Partition Coefficient (n-octanol/water), Shake Flask Method | 45751503 45751504 | United Phosphorus, Inc. | OWN | See endnote ¹ |
| 830.7560 | Partition Coefficient (n-octanol/water), Generator Column Method | | | | See 830.7550 |
| 830.7570 | Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography | | | | See 830.7550 |
| 830.7840 | Water Solubility: Column Elution Method; Shake Flask Method | 45751503 45751504 | United Phosphorus, Inc. | OWN | See endnote ¹ |
| 830.7860 | Water Solubility, Generator Column Method | | | | See 830.7860 |
| 830.7950 | Vapor Pressure | 45751503 45751504 | United Phosphorus, Inc. | OWN | See endnote ¹ |
| | | | | | |
| 870.1100 | Acute Oral Toxicity: Rat | Cite-All | | PAY | |
| 870.1200 | Acute Dermal Toxicity: Rat | Cite-All | | PAY | |
| Signature  | | | Name and Title Michael Kellogg, Consultant | | Date 9/8/05 |




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

| | | | | | |
|---|--|----------------------------------|---|-------------|--------------------------|
| Date September 8, 2005 | | EPA Reg No./File Symbol 70506-93 | | Page 4 of 5 | |
| Applicant's/Registrant's Name & Address United Phosphorus, Inc. 423 Riverview Plaza Trenton, NJ 08611 | | Product Clopyralid Technical | | | |
| Ingredient Clopyralid | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 870.1300 | Acute Inhalation Toxicity: Rat | Cite-All | | PAY | |
| 870.2400 | Primary Eye Irritation: Rabbit | Cite-All | | PAY | |
| 870.2500 | Primary Dermal Irritation | Cite-All | | PAY | |
| 870.2600 | Dermal Sensitization | Cite-All | | PAY | |
| Generic Data Requirements | | | | | |
| United Phosphorus, Inc. will make offers-to-pay to the following companies on the data submitters list of March 31, 2005. | | | | | |
| Clopyralid Generic Data Requirements | Cite-All Method utilized by United Phosphorus, Inc. for Clopyralid data requirements | | Nufarm Americas Inc. | PAY | |
| Clopyralid Generic Data Requirements | Cite-All Method utilized by United Phosphorus, Inc. for Clopyralid data requirements | | Lebanon Seaboard Corporation | PAY | |
| Clopyralid Generic Data Requirements | Cite-All Method utilized by United Phosphorus, Inc. for Clopyralid data requirements | | Albaugh, Inc. | PAY | |
| Clopyralid Generic Data Requirements | Cite-All Method utilized by United Phosphorus, Inc. for Clopyralid data requirements | | Dow AgroSciences LLC | PAY | |
| Clopyralid Generic Data Requirements | Cite-All Method utilized by United Phosphorus, Inc. for Clopyralid data requirements | | Spray Drift Task Force | | See endnote ⁵ |
| Signature  | | | Name and Title Michael Kellogg, Consultant | | Date 9/8/05 |

EPA


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

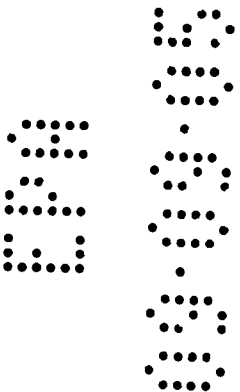
Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

| | | | | | |
|--|--|-------------------------------------|---|-------------|--------------------------|
| Date September 8, 2005 | | EPA Reg No./File Symbol 70506-93 | | Page 5 of 5 | |
| Applicant's/Registrant's Name & Address United Phosphorus, Inc. 423 Riverview Plaza Trenton, NJ 08611 | | Product Clopyralid Technical | | | |
| Ingredient Clopyralid | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| Clopyralid Generic Data Requirements | Cite-All Method utilized by United Phosphorus, Inc. for Clopyralid data requirements | | Outdoor Residential Exposure Task Force | | See endnote ⁶ |
| Clopyralid Generic Data Requirements | Cite-All Method utilized by United Phosphorus, Inc. for Clopyralid data requirements | | Agricultural Re-entry Task Force | | See endnote ⁷ |
| Clopyralid Generic Data Requirements | Cite-All Method utilized by United Phosphorus, Inc. for Clopyralid data requirements | | AgValue-Clopyr, LLC | | See endnote ⁸ |
| Clopyralid Generic Data Requirements | Cite-All Method utilized by United Phosphorus, Inc. for Clopyralid data requirements | | Agricultural Handler Exposure Task Force | PAY | |
| | | | | | |
| | | | | | |
| | | | | | |
| Signature  | | | Name and Title Michael Kellogg, Consultant | | Date 9/8/05 |

Endnotes for Data Matrix for Clopyralid Technical

-
- ¹ Data originally submitted by AgValue-Clopyr, LLC, now owned by United Phosphorus, Inc.
- ² **830.1650** – Per OPPTS 830.1000, these data are not required for the registration of a technical grade active ingredient. See 830.1620 for production process information.
- ³ **830.6314, 830.6315, 830.6316, 830.6317, 830.6319, 830.6320, 830.6321, 830.7100** – Per OPPTS 830.1000, these data are not required for the registration of a technical grade active ingredient.
- ⁴ **830.7220** – Per OPPTS 830.1000, these data are not required for the registration of Clopyralid Technical because this product is a solid. Please refer to OPPTS 830.7200.
- ⁵ United Phosphorus, Inc. is a member of this task force; therefore, no offer-to-pay is required to be submitted.
- ⁶ United Phosphorus, Inc. is a member of this task force; therefore, no offer-to-pay is required to be submitted.
- ⁷ United Phosphorus, Inc. is a member of this task force; therefore, no offer-to-pay is required to be submitted.
- ⁸ United Phosphorus, Inc. owns AgValue-Clopyr, LLC and as such, an offer-to-pay is not being made to AgValue-Clopyr, LLC



EPA


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

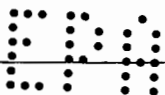
401 M Street, S.W.

WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

| | | | | | |
|--|----------------------|----------------------------------|---|-------------|---------------------------|
| Date September 8, 2005 | | EPA Reg No./File Symbol 70506-93 | | Page 1 of 5 | |
| Applicant's/Registrant's Name & Address United Phosphorus, Inc. 423 Riverview Plaza Trenton, NJ 08611 | | Product Clopyralid Technical | | | |
| Ingredient Clopyralid | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| | | | United Phosphorus, Inc. | OWN | See endnote ¹ |
| | | | United Phosphorus, Inc. | OWN | See endnote ¹ |
| | | | United Phosphorus, Inc. | OWN | See endnote ¹ |
| | | | | | Not required ² |
| | | | United Phosphorus, Inc. | OWN | See endnote ¹ |
| | | | United Phosphorus, Inc. | OWN | See endnote ¹ |
| | | | United Phosphorus, Inc. | OWN | See endnote ¹ |
| | | | United Phosphorus, Inc. | OWN | See endnote ¹ |
| | | | United Phosphorus, Inc. | OWN | See endnote ¹ |
| | | | United Phosphorus, Inc. | OWN | See endnote ¹ |
| Signature  | | | Name and Title Michael Kellogg, Consultant | | Date 9/8/05 |




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

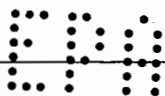
401 M Street, S.W.

WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

| | | | | | |
|--|----------------------|----------------------------------|---|--------------------------|---------------------------|
| Date September 8, 2005 | | EPA Reg No./File Symbol 70506-93 | | Page 2 of 5 | |
| Applicant's/Registrant's Name & Address United Phosphorus, Inc. 423 Riverview Plaza Trenton, NJ 08611 | | Product Clopyralid Technical | | | |
| Ingredient Clopyralid | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| | | | United Phosphorus, Inc. | OWN | See endnote ¹ |
| | | | United Phosphorus, Inc. | OWN | See endnote ¹ |
| | | | | | Not required ³ |
| | | | | | Not required ³ |
| | | | | | Not required ³ |
| | | | | | Not required ³ |
| | | | | | Not required ³ |
| | | | | | Not required ³ |
| | | | | | Not required ³ |
| | | | United Phosphorus, Inc. | OWN | See endnote ¹ |
| | | | United Phosphorus, Inc. | OWN | See endnote ¹ |
| | | | | | Not required ³ |
| | | United Phosphorus, Inc. | OWN | See endnote ¹ | |
| Signature  | | | Name and Title Michael Kellogg, Consultant | | Date 9/8/05 |



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date September 8, 2005

EPA Reg No./File Symbol 70506-93

Page 3 of 5

Applicant's/Registrant's Name & Address

United Phosphorus, Inc.
423 Riverview Plaza
Trenton, NJ 08611

Product

Clopyralid Technical

Ingredient Clopyralid

| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
|----------------------------|----------------------|-------------|-------------------------|--------|---------------------------|
| | | | | | Not required ⁴ |
| | | | United Phosphorus, Inc. | OWN | See endnote ¹ |
| | | | United Phosphorus, Inc. | OWN | See endnote ¹ |
| | | | United Phosphorus, Inc. | OWN | See endnote ¹ |
| | | | | | See 830.7550 |
| | | | | | See 830.7550 |
| | | | United Phosphorus, Inc. | OWN | See endnote ¹ |
| | | | | | See 830.7860 |
| | | | United Phosphorus, Inc. | OWN | See endnote ¹ |
| | | | | | |
| | | | | PAY | |
| | | | | PAY | |

Signature

Name and Title

Michael Kellogg, Consultant

Date

9/8/05

EPA

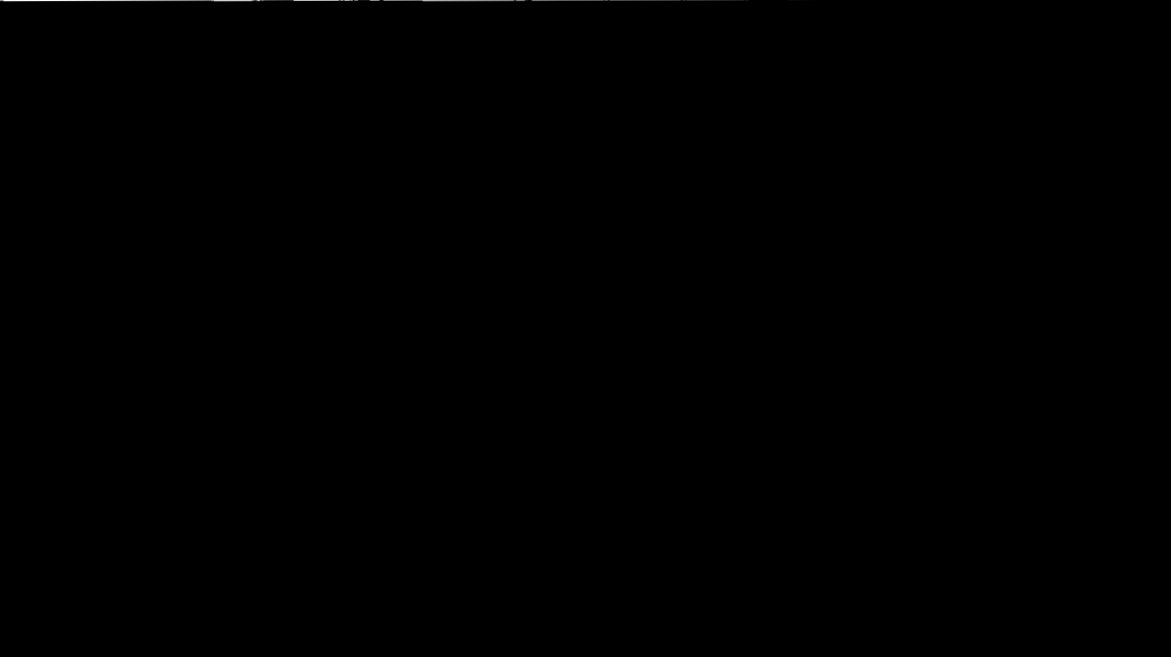

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

| | | | | | | |
|--|------------------------|----------------------------------|---|------------------------------|----------------|--|
| Date September 8, 2005 | | EPA Reg No./File Symbol 70506-93 | | Page 4 of 5 | | |
| Applicant's/Registrant's Name & Address United Phosphorus, Inc. 423 Riverview Plaza Trenton, NJ 08611 | | Product Clopyralid Technical | | | | |
| Ingredient Clopyralid | | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note | |
|  | | | | PAY | | |
| | | | | PAY | | |
| | | | | PAY | | |
| | | | | PAY | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | Nufarm Americas Inc. | PAY | |
| | | | | Lebanon Seaboard Corporation | PAY | |
| | Albaugh, Inc. | PAY | | | | |
| | Dow AgroSciences LLC | PAY | | | | |
| | Spray Drift Task Force | | See endnote ⁵ | | | |
| Signature  | | | Name and Title Michael Kellogg, Consultant | | Date 9/8/05 | |

EPA

Form Approved OMB No. 2070-0060


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

| | | | | | |
|--|----------------------|-------------------------------------|---|-------------|--------------------------|
| Date September 8, 2005 | | EPA Reg No./File Symbol 70506-93 | | Page 5 of 5 | |
| Applicant's/Registrant's Name & Address United Phosphorus, Inc. 423 Riverview Plaza Trenton, NJ 08611 | | Product Clopyralid Technical | | | |
| Ingredient Clopyralid | | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| | | | Outdoor Residential Exposure Task Force | | See endnote ⁶ |
| | | | Agricultural Re-entry Task Force | | See endnote ⁷ |
| | | | AgValue-Clopyr, LLC | | See endnote ⁸ |
| | | | Agricultural Handler Exposure Task Force | PAY | |
| | | | | | |
| Signature  | | | Name and Title Michael Kellogg, Consultant | | Date 9/8/05 |



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

274882**Application for Pesticide – Section I**

| | | |
|---|--|---|
| 1. Company/Product Number 70506-93 | 2. EPA Product Manager J. Miller | 3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name) United Phosphorus, Inc./Clopyralid Technical | PM # 23 | |
| 5. Name and Address of Applicant (Include ZIP Code) United Phosphorus, Inc. 423 Riverview Plaza Trenton, NJ 08611 <input type="checkbox"/> Check if this is a new address | 6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg No. _____ Product Name _____ | |

Section - II

| | | |
|--|---|---|
| <input type="checkbox"/> Amendment – Explain below | <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ | NOTIFICATION JUL 21 2005 |
| <input type="checkbox"/> Resubmission in response to Agency letter dated _____ | <input type="checkbox"/> "Me Too" Application | |
| <input checked="" type="checkbox"/> Notification – Explain below | <input type="checkbox"/> Other – Explain below | |

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Notification of changes to label and CSF related to change in company ownership.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section III

| | | | | | |
|--|---|--|-------------------|--|-------------------|
| 1. Material This Product Will be Packaged in: | | | | 2. Type of Container | |
| Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No | Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No | Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No | | <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____ | |
| *Certification must be submitted | | If "Yes" Unit Packaging wgt. | No. per container | If "Yes" Package wgt | No. per container |
| 3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container | | 4. Size(s) Retail Container | | 5. Location of label directions <input type="checkbox"/> On Label <input type="checkbox"/> On Label accompanying product | |
| 6. Manner in Which Label is Affixed to Product | | <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____ | | | |

Section IV

1. Contact Person (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

| | | |
|----------------------------|-------------------------------------|---|
| Name Rebecca A. Clemmer | Title Regulatory Affairs Manager | Telephone No. (Include Area Code) 609-392-8200 |
|----------------------------|-------------------------------------|---|

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law

2. Signature
3. Title
Regulatory Affairs Manager4. Typed Name
Rebecca A. Clemmer5. Date
July 7, 2005

6. Date Application Received

AgValue Clopyralid Technical

ACTIVE INGREDIENT:

Clopyralid: 3,6-dichloro-2-pyridinecarboxylic acid..... 96.0%

INERT INGREDIENTS:..... 4.0%**TOTAL**..... 100.0%**KEEP OUT OF REACH OF CHILDREN****DANGER****FIRST AID**

| | |
|--------------------------------|---|
| If in eyes: | <ul style="list-style-type: none">• Hold eye open and rinse slowly with a steady, gentle stream of water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or physician for treatment advice. |
| If swallowed: | <ul style="list-style-type: none">• Call a physician or poison control center immediately for treatment advice.• Have person sip a glass of water if able to swallow.• DO NOT induce vomiting unless told to do so by poison control center or physician.• Do not give anything by mouth to an unconscious person. |
| If inhaled: | <ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably, mouth-to-mouth, if possible.• Call a poison control center or physician for treatment advice. |
| If on skin or clothing: | <ul style="list-style-type: none">• Take off contaminated clothing.• Wash skin with plenty of water for 15-20 minutes.• Call a poison control center or physician for treatment advice. |

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage. Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

For chemical emergency: spill, leak, fire, exposure or accident, call CHEMTREC at 1-800-424-9300.

See side panel for additional precautionary statements.

Manufactured For:AgValue Clopyr, LLC United Phosphorus, Inc.Visalia, CA 93291-423 Riverview PlazaTrenton, NJ 086111-800-247-1557 • www.upi-usa.com**EPA Reg. No. 75147-370506-93****EPA Est. No.**

Net Weight:

NOTIFICATION**JUL 21 2005**

PRECAUTIONARY STATEMENTS
Hazard to Humans and Domestic Animals
DANGER

Corrosive. Causes irreversible eye damage. Harmful if absorbed through skin or inhaled. Do not get in eyes or on skin and clothing. Wear goggles or face shield when handling. Avoid breathing dust. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product may only be formulated into manufacturing-use herbicide products or end-use herbicide products for the following uses:

Agricultural Uses

Asparagus, barley, corn, fallow land, grasses, mint, oats, pasture, rangeland, sugar beets, tree plantations, and wheat. This product may be used to formulate products for specific use(s) not listed on this label, except residential turf, if the formulator, user group or grower has complied with U.S. EPA submission requirements regarding the support of such use(s). Consult [~~AgValue-Clopyr, LLC~~United Phosphorus, Inc.](#) for instructions for formulation and other information.

Non-Agricultural Uses

For manufacture of herbicides for use only on non-residential turf such as athletic and recreational sports fields, cemeteries, golf courses, industrial sites, non-cropland, parks, rights-of-way, and roadsides. This product may be used to formulate products for specific use(s) not listed on this label, except residential turf, if the formulator, user group or grower has complied with U.S. EPA submission requirements regarding the support of such uses(s). Consult [~~AgValue-Clopyr, LLC~~United Phosphorus, Inc.](#) for instructions for formulation and other information.

This product must not be formulated into manufacturing-use products or end-use products for use on residential turf.

If the product is labeled for reformulation into products bearing labeling for turf applications other than residential turf, the formulated product label must contain the following statements:

- Do not use on residential turf
- Do not send clippings to a compost facility
- Do not collect grass clippings for mulch or compost
- Applicator must give notice to landowners/property managers to not use grass clippings for composting.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE

Store in a cool, dry, well-ventilated area.

PESTICIDE DISPOSAL

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL

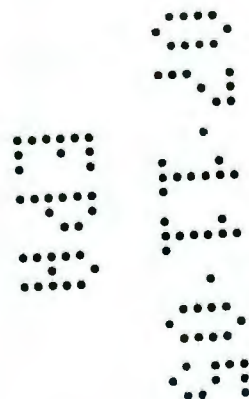
Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by procedures approved by state and local authorities.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

United Phosphorus, Inc. warrants that at the time of delivery, this product will conform to its chemical description on the label, that it will pass without objection in the trade under the contract description, that the seller will convey title hereto, and that such product will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. UNITED PHOSPHORUS, INC. EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. BUYER ACKNOWLEDGES THE USE OF ITS OWN INDEPENDENT SKILL AND EXPERTISE IN THE SELECTION AND USE OF THE PRODUCT AND DOES NOT RELY ON ANY ORAL OR WRITTEN STATEMENTS OR REPRESENTATIONS.

Rev. 6/05





United Phosphorus, Inc.

423 Riverview Plaza
Trenton, NJ 08611
(609) 392-8200 x 18 (phone)
(609) 392-0808 (fax)

Rebecca A. Clemmer
Regulatory Affairs Manager

July 7, 2005

Joanne Miller (PM 23)
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504C)
U.S. Environmental Protections Agency
1801 Bell Street
Arlington, VA 22202

Re: Submission of Revised Labeling and Confidential Statements of Formula for
Clopyralid Technical (EPA Reg. No. 70506-93)
Oryzalin Technical (EPA Reg. No. 70506-95)
Etho Tech (EPA Reg. No. 70506-105)

Dear Ms. Miller:

In connection with the recent transfer of registrations from AgValue to United Phosphorus, UPI is submitting the attached Notifications to accomplish these actions for the subject products:

- remove "AgValue" from the product names;
- add CHEMTREC contact information to the main panel;
- update all AgValue information to United Phosphorus; and
- add warranty language.

In support of the changes, enclosed please find:

- one copy of each label, marked to show changes, and
- EPA form 8570-1 for each product.

Also enclosed for your files is a copy of a Confidential Statement of Formula for each of the products. These CSFs are the most recently approved versions already in Agency files, with the only changes being the company name and EPA Registration Number.

no CSF release

Please contact me if you have any questions.

Very truly yours,

R. A. Clemmer

Rebecca A. Clemmer
rclemmer@upi-usa.com



United Phosphorus, Inc.

423 Riverview Plaza
Trenton, NJ 08611
(609) 392-8200 (phone)
(609) 392-0808 (fax)

Ann M. Tillman
Technical Director

December 14, 2004

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agent for United Phosphorus, Inc. (EPA Company Number 70506), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

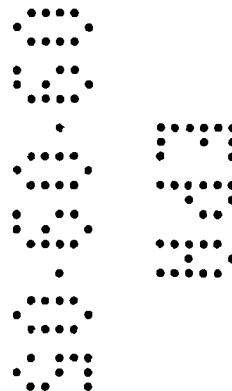
In addition, United Phosphorus Inc. (UPI) recently purchased AgValue, Inc. (and its subsidiaries) and UPI is currently in the process of transferring current and pending registrations to UPI. Until the transfer is complete, Pyxis Regulatory Consulting, Inc. is also authorized to act as agent for AgValue, Inc. (EPA Company Number 73917) and its subsidiaries, including but not limited to AgValue-Bromacil, LLC (EPA Company Number 80824); AgValue-Clopyr, LLC (EPA Company Number 75147); AgValue-DP, LLC (EPA Company Number 75240); AgValue-Etho, LLC (EPA Company Number 75522); AgValue-Metri, LLC (EPA Company Number 79604); AgValue-Oryza, LLC (EPA Company Number 75523); AgValue-Picloram, LLC (EPA Company Number 75722); AgValue-Pronamide, LLC (EPA Company Number 80825); and AgValue-Propargite, LLC (EPA Company Number 81994), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Ann M. Tillman, Ph.D.
Technical Director
United Phosphorus, Inc.

cc: J. Kay, Pyxis Regulatory Consulting, Inc.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

April 28, 2005

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MS. ANN TILLMAN
UNITED PHOSPHORUS INC
423 RIVERVIEW PLAZA
TRENTON, NJ 08611

Dear Ms. Tillman:

Subject: Transfer of Pesticide Registrations and Data From Company Number 75147 to
Company Number 70506

Pursuant to your request in your letter and transfer agreement of November 23, 2004 and subsequent information received on January 26, 2005, we have approved the transfer of the following registrations and data from **AGVALUE-CLOPYR, LLC**, company number 75147 to **UNITED PHOSPHORUS INC**, company number 70506.

The effective date of these changes is the date of this letter.

| <u>Registered Products</u> | <u>Old EPA Reg. No.</u> | <u>New EPA Reg. No.</u> |
|---------------------------------|-----------------------------|-----------------------------|
| AGVALUE CLOPYRALID TECHNICAL | 75147-3 | 70506-93 |
| AGVALUE CLOPYRALID AG HERBICIDE | 75147-4 | 70506-94 |

You should indicate the new company designation, new EPA Registration Number and new Establishment Number (if it has changed) on the labeling at the next printing which should occur no later than 18 months after the effective date of this transfer. After 18 months, any product released for shipment must bear the new Registration Number and Establishment Number. If you intend to use the labels which currently appear on the transferor's product after the effective date of the transfer, but within the 18 month grace period, you must maintain complete and accurate records which identify by batch number, lot number, or other suitable description the quantities of such product bearing the transferor's label. Each container or package bearing the transferor's label which is released after the effective date of product registration transfer, must be clearly and accurately marked with the batch number, lot number or other descriptive designation used to identify the product in your records.

Supplemental distribution agreements of registered products do not transfer with the Section 3 registration. It is your responsibility as the registrant to notify any and all supplemental distributors of the transferred product(s) of this transfer agreement. If you wish to enter into

supplemental distribution agreements of your product(s) under this new registration, the form "Notice of Supplemental Distribution of a Registered Pesticide Product," EPA Form 8570-5, must be submitted to the Agency for each supplemental distributorship.

You are required to contact your local EPA Regional Office to determine what effect this transfer of pesticide registrations has on the pesticide production establishment registration.

It will not be necessary to submit labeling for review if the only changes are in the company designation and the EPA Registration Number. Other changes in the product and/or labeling may require EPA review and approval prior to initiation. In any correspondence on these products always refer to the U.S. EPA Registration Number listed above.

The transferred registration will have the same status under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, 7 USC 136 et seq., as it had prior to the approval of this transfer.

When registrations are transferred from one company to a second company, all restrictions, data requirements, conditions (suspensions), and deadlines existing on the registrations are transferred with the registrations. The new company is responsible for adhering to or complying with all such restrictions, etc. on the acquired products.

In regard to deadlines, the transferee company is responsible for submitting all required data according to the schedules already established for the acquired products. Failure to do so will result in the issuance of a Notice of Intent to Suspend. Requests from transferee companies for additional time to submit, because they acquired the registration(s) after the 3(c)(2)(B) request was issued will not be granted. If a transferee company has other valid reasons for delays in the testing which were clearly outside of their control, then such requests for time extensions will be considered in accordance with the established procedures. Transfers occurring while a 3(c)(2)(B) request is being issued or during the 90-day response time are subject to the same conditions expressed above.

Registration is in no way to be construed as an endorsement or approval of these products by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with FIFRA.

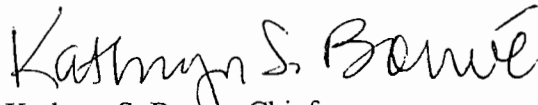
Furthermore, the transfer of the subject registrations is approved under the condition that the annual maintenance fee obligation has been fully satisfied. The marginal maintenance fee is determined based solely on the total number of active section 3 and section 24(c) registrations held by the transferor. If the annual maintenance fee has not been fully satisfied, the transferee and transferor will be notified to comply within a specified time period or the affected registrations may be canceled.

The Agency acknowledges it has received a request for data transfer dated November 23, 2004 and subsequent information received on January 26, 2005 to transfer data ownership from the transferor to the transferee. The data transfer is effective the date of this letter. After this date UNITED PHOSPHORUS INC will be considered the data owner. This action will not automatically reflect on the Data Submitters List. If you want to be added to the Data Submitters List, you must submit a request to:

Document Processing Desk (DSL)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

By copy of this letter we are informing the transferor of these changes. If you have any questions about this transfer approval please contact Evelyn Alston at (703) 305-5058.

Sincerely,



Kathryn S. Bourne, Chief
Information Services Branch
Information Resources & Services Div. (7504C)

cc: N. BUSHAN MANDAVA
MANDAVA ASSOCIATES, AGENT FOR
AGVALUE-CLOPYR, LLC
1730 M STREET, N.W., SUITE 906
WASHINGTON, DC 20036-4510

PYXIS REGULATORY CONSULTING, INC.

11324 17th Ave. Ct. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
Email: www.PyxisRC.com

June 21, 2004

COURIER DELIVERY

Joanne Miller (PM23)
Document Processing Desk (FNL LBL)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall #2
1921 Jefferson Davis Highway
Arlington, VA 22202

RE: AgValue-Clopyr, LLC – AgValue Clopyralid Technical (EPA Reg. No. 75147-3)
Submission of Final Labeling per the Agency Letter dated May 1, 2003


Dear Ms. Miller,

On behalf of AgValue-Clopyr, LLC please find the enclosed final product labeling in response to the Agency letter dated May 1, 2003. In support of this submission, please find the following:

1. Application for Pesticide Registration (EPA Form 8570-1)
2. One (1) copy of the AgValue Clopyralid Technical final label
3. Letter of Authorization

Please feel free to call me if you have any questions or need any additional information.

Sincerely,



Michael Kellogg

Enclosures

cc: Brian Heinze; AgValue-Clopyr, LLC





United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

| | | |
|--|---|--|
| 1. Company/Product Number 75147-3 | 2. EPA Product Manager J. Miller | 3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name) AgValue-Clopyr, LLC / AgValue Clopyralid Technical | PM# 23 | |
| 5. Name and Address of Applicant (Include ZIP Code) AgValue-Clopyr, LLC c/o Pyxis Regulatory Consulting, Inc. 11324 17th Ave. Ct. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address | 6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____ | |

Section - II

| | |
|---|--|
| <input type="checkbox"/> Amendment - Explain below. | <input type="checkbox"/> Final printed labels in response to Agency letter dated May 1, 2003 |
| <input checked="" type="checkbox"/> Resubmission in response to Agency letter dated _____ | <input type="checkbox"/> "Me Too" Application. |
| <input type="checkbox"/> Notification - Explain below. | <input type="checkbox"/> Other - Explain below. |

Explanation: Use additional page(s) if necessary. (For section I and Section II.)
Submission of final product labeling per the Agency letter dated May 1, 2003.

Section - III

| | | | | | |
|---|---|--|--|---|--|
| 1. Material This Product Will Be Packaged In: | | | | 2. Type of Container | |
| Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No | Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No | Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No | | <input type="checkbox"/> Metal | |
| | | | | <input type="checkbox"/> Plastic | |
| | | | | <input type="checkbox"/> Glass | |
| | | | | <input type="checkbox"/> Paper | |
| | | | | <input type="checkbox"/> Other (Specify) _____ | |
| 3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container | | 4. Size(s) Retail Container | | 5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product | |
| 6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled | | <input type="checkbox"/> Other _____ | | | |

Section - IV

| | | | | | |
|---|--|--------------------|--|---|---|
| 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.) | | | | | |
| Name Michael Kellogg | | Title Agent | | Telephone No. (include Area Code) (253) 853-7369 | |
| Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. | | | | | 6. Date Application Received (Stamped) |
| 2. Signature | | 3. Title Agent | | | |
| 4. Typed Name Michael Kellogg | | 5. Date 6/21/04 | | | |

AgValue Clopyralid Technical

ACTIVE INGREDIENT:

Clopyralid: 3,6-dichloro-2-pyridinecarboxylic acid96.0%

INERT INGREDIENTS:.....4.0%

TOTAL100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

FIRST AID

| | |
|--------------------------------|---|
| If in eyes: | <ul style="list-style-type: none">• Hold eye open and rinse slowly with a steady, gentle stream of water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or physician for treatment advice. |
| If swallowed: | <ul style="list-style-type: none">• Call a physician or poison control center immediately for treatment advice.• Have person sip a glass of water if able to swallow.• DO NOT induce vomiting unless told to do so by poison control center or physician.• Do not give anything by mouth to an unconscious person. |
| If inhaled: | <ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably, mouth-to-mouth, if possible.• Call a poison control center or physician for treatment advice. |
| If on skin or clothing: | <ul style="list-style-type: none">• Take off contaminated clothing.• Wash skin with plenty of water for 15-20 minutes.• Call a poison control center or physician for treatment advice. |

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

Manufactured For:
AgValue-Clopyr, LLC
Visalia, CA 93291

Except for home use
NOT REVIEWED
In Accordance with PR Notice 82-2
Based on Draft Labeling Dated
EPA Est. No. 75487-CHN-001
5/1/2003

Net Weight: 44 Lbs. (20 KG)



PRECAUTIONARY STATEMENTS Hazard to Humans and Domestic Animals

DANGER

Corrosive. Causes irreversible eye damage. Harmful if absorbed through skin or inhaled. Do not get in eyes or on skin and clothing. Wear goggles or face shield when handling. Avoid breathing dust. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product may only be formulated into manufacturing-use herbicide products or end-use herbicide products for the following uses:

Agricultural Uses

Asparagus, barley, corn, fallow land, grasses, mint, oats, pasture, rangeland, sugar beets, tree plantations, and wheat. This product may be used to formulate products for specific use(s) not listed on this label, except residential turf, if the formulator, user group or grower has complied with U.S. EPA submission requirements regarding the support of such use(s). Consult AgValue-Clopyr, LLC for instructions for formulation and other information.

Non-Agricultural Uses

For manufacture of herbicides for use only on non-residential turf such as athletic and recreational sports fields, cemeteries, golf courses, industrial sites, non-cropland, parks, rights-of-way, and roadsides. This product may be used to formulate products for specific use(s) not listed on this label, except residential turf, if the formulator, user group or grower has complied with U.S. EPA submission requirements regarding the support of such use(s). Consult AgValue-Clopyr, LLC for instructions for formulation and other information.

This product must not be formulated into manufacturing-use products or end-use products for use on residential turf.

If the product is labeled for reformulation into products bearing labeling for turf applications other than residential turf, the formulated product label must contain the following statements:

Do not use on residential turf

Do not send clippings to a compost facility

Do not collect grass clippings for mulch or compost

Applicator must give notice to landowners/property managers to not use grass clippings for composting.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE

Store in a cool, dry, well-ventilated area.

PESTICIDE DISPOSAL

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL

Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by procedures approved by state and local authorities.



1124 North Chinoweth Street • Visalia, California 93291
Phone: 559/627-6956 • Fax: 559/627-6962 • Toll Free: 866/511-3171 • www.agvalue.net

April 12, 2004

To Whom It May Concern:

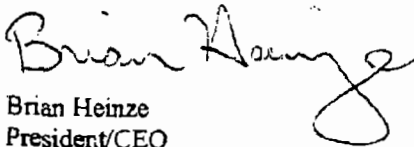
RE: Letter of Authorization

Dear Sir or Madam:

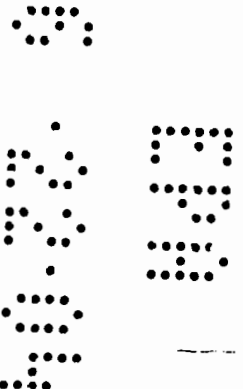
Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized as agents for AgValue-Clopyr, LLC (EPA Company Number 75147) before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,


Brian Heinze
President/CEO

cc: Pyxis Regulatory Consulting, Inc.





U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division (7505C)
401 "M" St., S.W.
Washington, D.C. 20460

EPA Reg.
Number:

75147-3

Date of Issuance:

MAY 1 2003

Term of Issuance:

Conditional

Name of Pesticide Product:

AgValue Clopyralid
Technical

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration
(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

AgValue-Clopyr, LLC
1124 N. Chinowth Street
Visalia, CA 93291

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c) (7) (A) provided that you:

1. Submit and/or cite all data required for registration/reregistration of your product when the Agency requires all registrants of similar products to submit data.
2. Make the following label changes listed below before you release the product for shipment:
 - a. Add the phrase, "EPA Reg. No.75147-3".
 - b. In the first bullet on the second page correct the spelling of "not".
 - c. The net contents must be in English Units. According to our calculations 44 lbs. The Metric unit may follow the English Unit. Refer to 40 CFR 156.10(d).
3. Submit the results of the one year storage stability and corrosion characteristics studies upon completion.

Signature of Approving Official:

Joanne J. Miller

Date:

MAY 1 2003

page 2

EPA Reg. No.75147-3

4. Submit one (1) copy of your final printed labeling before you release the product for shipment. Refer to the A-79 enclosure for a further description of final printed labeling.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

Joanne I. Miller
Product Manager (23)
Herbicide Branch
Registration Division (7505C)

AGVALUE CLOPYRALID TECHNICAL

ACTIVE INGREDIENT:
 Clopyralid: 3,6-dichloro-2-pyridinecarboxylic acid 96.0%
 INERT INGREDIENTS: 4.0%
 TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN
DANGER

FIRST AID

If in eyes:

- Hold eye open and rinse slowly with a steady, gentle stream of water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or physician for treatment advice.

If swallowed:

- Call a physician or poison control center immediately for treatment advice
- Have person sip a glass of water if able to swallow.
- DO NOT induce vomiting unless told to do so by poison control center or physician.
- Do not give anything by mouth to an unconscious person.

If inhaled:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably, mouth-to-mouth, if possible.
- Call a poison control center or physician for treatment advice.

**If on skin or :
clothing**

- Take off contaminated clothing.
- Wash skin with plenty of water for 15-20 minutes.
- Call a poison control center or physician for treatment advice.

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment

See side panel for additional precautionary statements.

Net Contents: 20 KG

EPA Est. No.
EPA Reg. No. 75147-

Manufactured For:
AgValue-Clopyr, LLO
Visalia, CA 93291

ACCEPTED
with COMMENTS
In EPA Letter Dated:

MAY 1 2003

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
75147-3

PRECAUTIONARY STATEMENTS

Hazard to Humans and Domestic Animals **DANGER**

Corrosive. Causes irreversible eye damage. Harmful if absorbed through skin or inhaled. Do not get in eyes or on skin and clothing. Wear goggles or face shield when handling. Avoid breathing dust. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product may only be formulated into manufacturing-use herbicide products or end-use herbicide products for the following uses:

Agricultural Uses

Asparagus, barley, corn, fallow land, grasses, mint, oats, pasture, rangeland, sugar beets, tree plantations, and wheat. This product may be used to formulate products for specific use(s) not listed on this label, except residential turf, if the formulator, user group or grower has complied with U.S. EPA submission requirements regarding the support of such use(s). Consult AgValue-Clopyr, LLC for instructions for formulation and other information.

Non-Agricultural Uses

For manufacture of herbicides for use only on non-residential turf such as athletic and recreational sports fields, cemeteries, golf courses, industrial sites, non-cropland, parks, rights-of-way, and roadsides. This product may be used to formulate products for specific use(s) not listed on this label, except residential turf, if the formulator, user group or grower has complied with U.S. EPA submission requirements regarding the support of such use(s). Consult AgValue-Clopyr, LLC for instructions for formulation and other information.

This product must not be formulated into manufacturing-use products or end-use herbicide products for use on residential turf.

If the product is labeled for reformulation into products bearing labeling for turf applications other than residential turf, the formulated product label must contain the following statements:

- Do no use on residential turf
- Do not send clippings to a compost facility
- Do not collect grass clippings for mulch or compost
- Applicator must give notice to landowners/property managers to not use grass clippings for composting.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE

Store in a cool, dry, well-ventilated area.

PESTICIDE DISPOSAL

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL

Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by procedures approved by state and local authorities.

#14622

DP BARCODE: D288008

CASE: 067389
SUBMISSION: S628339

DATA PACKAGE RECORD
BEAN SHEET

DATE: 01/27/03
Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION ACTION: 166 RESB NEW PRO-OC-MIN CHG
RANKING : 10 POINTS ()
CHEMICALS: 117403 Clopyralid (ANSI) 96.0000%

ID#: 075147-G AGVALUE CLOPYRALID TECHNICAL

COMPANY: 075147 AGVALUE-CLOPYR, LLC

PRODUCT MANAGER: 23 JOANNE MILLER

703-305-6224 ROOM: CM2 237

PM TEAM REVIEWER: JAMES STONE

703-305-7391 ROOM: CM2 257

RECEIVED DATE: 01/21/03 DUE OUT DATE: 07/20/03

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 288008 EXPEDITE: N DATE SENT: 01/27/03 DATE RET.: / /

CHEMICAL: 117403 Clopyralid (ANSI)

DP TYPE: 001 Submission Related Data Package

CSF: Y

LABEL: Y

| ASSIGNED TO | DATE | IN | DATE | OUT | ADMIN DUE DATE: |
|------------------|---------|----|---------|-----|-----------------|
| DIV : RD | / | / | / | / | 06/16/03 |
| BRAN: TRB | / | / | / | / | NEGOT DATE: / / |
| SECT: CHEM | / | / | / | / | PROJ DATE: / / |
| REVR : S.B. Math | 4/21/02 | | 4/22/03 | | |
| CONTR: | / | / | / | / | |

* * * DATA REVIEW INSTRUCTIONS * * *

Review revised CSF and response to Shyam Mathur's review dated 12-27-02.

* * * DATA PACKAGE EVALUATION * * *

No evaluation is written for this data package

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

| DP BC | BRANCH/SECTION | DATE OUT | DUE BACK | INS | CSF | LABEL |
|-------|----------------|----------|----------|-----|-----|-------|
|-------|----------------|----------|----------|-----|-----|-------|

DATE OUT: 22/ APR / 2003

SUBJECT: PRODUCT CHEMISTRY REVIEW OF TGAI / MP [] EP [X]

DP BARCODE No.: D288008 File Symbol No.: 75147-G PRODUCT NAME: AGVALUE Clopyralid
Technical

COMPANY: AGVALUE-CLOPYR, LLC PCC: 117403

FOOD USE [X] INTEGRATED FORMULATION [X]

FROM: Shyam Mathur, Team Leader
Product Chemistry Team
Technical Review Branch/RD (7505C)

S. Mathur
4-22-03
mc
4-22-03

TO: Joanne Miller / James Stone, PM 23
Herbicide Branch/RD(7505C)

INTRODUCTION:

The product chemistry data for the proposed technical was reviewed previously (PCR dated 12-27-02, D285622). The registrant was advised to correct the CSF for basic formulation, submit data on one year storage stability (830.6317) and corrosion characteristics (830.6320) studies. The registrant was also informed to explain the significant difference in the values of density for the proposed technical (75147-G) and the registered technical (62719-80). The two products were determined to be substantially similar from the product chemistry view point. The applicant is requesting the conditional registration for the proposed technical.

The registrant responded on January 15, 2003 and provided all the required information. The TRB has been asked to evaluate the submitted data.

FINDINGS & CONCLUSIONS:

1. The revised CSF for basic formulation (dated 01-15-03) is filled out correctly and completely. The nominal concentration of the active ingredient Clopyralid (96%) concurs with the product label claim nominal concentration. It is in compliance with PR Notice 91-2. The revised CSF for basic formulation is acceptable.
2. The registrant has stated that the studies corresponding to guideline reference 830.6317 (one year storage stability) and 830.6320 (Corrosion characteristics) will be started once the conditional registration is approved for the product.
3. The registrant also explained the difference in the density values for the proposed and registered technical. The Agency agrees with the explanation provided.
4. All other product chemistry data for the proposed technical satisfy the product chemistry data requirements of 40CFR158.150 to 150.190.

MANDAVA ASSOCIATES

CONSULTANTS IN SCIENCE, TECHNOLOGY AND REGULATORY AFFAIRS

1730 M STREET, N.W., SUITE 906, WASHINGTON, DC 20036-4512

TELEPHONE: (202)-223-1424/1747 · TELEFAX: (202)-223-0141 · E-Mail: mandava@compuserve.com

HAND DELIVERED

January 15, 2003

Ms. Joanne I. Miller
Product Manager 23
Herbicide Branch
Registration Division (7505C)
U.S. Environmental Protection Agency
Washington, DC 20460

SUBJECT: ME-TOO Application For Registration of AgValue CLOPYRALID
TECHNICAL
Active Ingredient: Clopyralid
EPA File Symbol: 75147-G
Response to Your Letter Dated January 7, 2003

Dear Ms. Miller:

This letter is in response to your January 7, 2003 letter informing us that the application for AgValue Clopyralid Technical (EPA File Symbol: 75147-G) is incomplete because of some deficiencies identified in your letter.

In this letter, we have addressed and/or corrected the deficiencies as noted below:

1. Product Chemistry Issues:

- a. *There is a significant difference in the density values of the proposed product [31.2 lbs/cu.ft] and the registered product. Verify the accuracy of the measurement of the density of Clopyralid produced by [REDACTED]*

Response: The density of the AgValue Clopyralid Technical was found to be 0.501 g/mL at 20°C (which is equivalent to 31.2 lbs/ft³). The registered product (Clopyralid by Dow AgroSciences) has a relative density of 1.575 at 20°C and a bulk density of 0.46 g/mL at 25°C. [See Dow AgroSciences Clopyralid, a North American Technical Profile. Source: <http://wric.ucdavis.edu/yst/manage/ClopTechProfile.pdf>].

The reported value is 1.57 at 20°C (Source: Pesticide Manual, 10th Edition, 2000).

Product ingredient source information may be entitled to confidential treatment

The method that was used for density determination of the proposed product (see Page 21 of 36, Volume 3B; MRID #45751504) involves the measurement of the weights of the test substance at two different specified marks ("0" and "24") in Le Chatelier density bottle. The procedure consists of three steps:

- Step 1: Measurement of the volume of the bottle up to mark "0" and mark "24" with water (whose density is known).
- Step 2: Measurement of the weight of the test substance in that known volume up to mark "0" and "24" (see Step 1).
- Step 3: Calculation of density using the volume (from Step 1) and weight of the test substance (occupies to mark "0" and "24").

The data presented on Page 21 of 36 in Volume 3B (MRID #45751504) showed that the density of the test substance is 0.501 g/mL.

In order to verify the value obtained from the above-mentioned method, we have determined the bulk density by measuring the weight of the test substance for a known volume. [Weighing the test substance that occupies 100 ml of the graduated (measuring) cylinder.] The bulk density of the test substance was found to be 0.47 g/mL at ambient temperature.

As shown above, Dow AgroSciences reported the bulk density of clopyralid technical is 0.46 g/mL at 25°C. The density of AgValue Clopyralid Technical is 0.501 g/mL at 20°C. In other words, what we measured for the subject product is the bulk density (using the Le Chatelier density bottle) which is close to the value reported by Dow AgroSciences.

Additional information on the usage of density, relative density and bulk density is provided in Attachment 1.

- b. *Submit a updated Confidential Statement of Formula with the following corrections:*
 - i. *The lower certified limit of the first impurity listed on the CSF is incorrect and must be deleted from the CSF.*

Response: In the revised Confidential Statement of Formula (CSF), we deleted the lower certified limit for the first impurity. The amended CSF is enclosed with this letter.

- ii. *Specify the Total Weight in Box 17.*

Response: The Total Weight in Box 17 is entered as shown in the revised CSF.

- iii. *The % by weight column 13.b. must total 100%.*

Response: In the revised CSF, the % by weight in column 13.b now totals 100% as shown in the revised CSF.

- c. *You must conduct one year storage stability [830.6317] and corrosion characteristics [830.6320] studies under warehouse conditions in commercial containers. The results of these studies must be submitted to the Agency upon completion.*

Response: The storage stability [830.6317] and corrosion characteristics [830.6320] studies will be initiated after the registration for the subject product is granted and a report (containing the results) will be submitted to EPA within 2 years. Please grant the registration so that the company will initiate these studies.

2. Labeling Issues:

The applicant claimed that the subject product (AgValue CLOPYRALID TECHNICAL, EPA File Symbol: 75147-G) is substantially similar to LONTREL T Technical which was originally registered by Dow Chemical Company (EPA Reg. No.: 464-613). LONTREL T Technical was subsequently transferred to Dow AgroSciences (Reg. No.: 62719-80). The current label for LONTREL T Technical was approved by EPA on September 27, 2002.

When we prepared the registration application for the subject product, we used the LONTREL T Technical label approved by EPA on February 12, 1998. This was the label that was available to us when we submitted our registration application for AgValue CLOPYRALID TECHNICAL (EPA Receipt Date: September 3, 2002).

We noticed that the Agency used the LONTREL T Technical label approved on September 27, 2002 for suggesting corrections to proposed product label. We have made all the recommended changes in the draft label for AgValue CLOPYRALID TECHNICAL (EPA File Symbol: 75147-G). We have also included in the revised label additional information on "Agricultural Uses" and "Non-agricultural Uses" sections based on the information presented in LONTREL T Technical. A revised draft label (five copies) for the subject product is enclosed.

We have provided our responses to your suggestions and corrections to draft label as noted below:

Submit five draft labels with the following corrections:

- a. *If all of the Precautionary Statements do not appear on the front panel, add a referral statement similar to the following:*

See side panel for additional precautionary statements.

Response: As you suggested, we have included a statement on the amended draft label. We are submitting copies of amended draft label for your approval.

b. *At the beginning of the Hazards to Humans section add "Corrosive".*

Response: As you suggested, we have added the phrase "corrosive" at the beginning of the Hazards to Humans section.

c. *In the Manufacturing Use Only section delete "trees", "industrial sites", non-cropland", "rights-of-way" and "turf". Delete the comma ", " between sugar and beets.*

Response: As per your suggestion, we have deleted "trees", "industrial sites", non-cropland", "rights-of-way" and "turf" and also the comma ", " between sugar and beets in the Manufacturing Use Only section. Please note that we have replaced Manufacturing Use Only section with Agricultural Use section consistent with the information in LONTREL T Technical label (EPA approval date: September 27, 2002).

d. *If you intend this product to be used to manufacture herbicides for non-agricultural uses, add a section similar to the following:*

For manufacture of herbicides for use only on non-residential turf such as athletic and recreational sports fields, cemeteries, golf courses, industrial sites, non-cropland, parks, rights-of-way, and roadsides.

This product must not be formulated into manufacturing-use products or end-use herbicide products for use on residential turf.

If the product is labeled for reformulation into products bearing labeling for turf applications other than residential turf, the formulated product label must contain the following statements:

- *Do no use on residential turf*
- *Do not send clippings to a compost facility*
- *Do not collect grass clippings for mulch or compost*
- *Applicator must give notice to landowners/property managers to not use grass clippings for composting.*

Response: The amended draft label contains all the suggested changes. We have created "Non-agricultural Use" section and included the information in this section. We have also added other information to this section consistent with the LONTREL T Technical label (EPA approval date: September 27, 2002).

Ms. Joanne I. Miller
January 15, 2003

Page 5

We have enclosed five copies of the revised draft label for AgValue CLOPYRALID TECHNICAL (EPA File Symbol: 75147-G) for your review and approval.

Since all the above-mentioned issues (product chemistry and labeling) are now resolved/or addressed satisfactorily, we request you to grant the registration for the subject product.

Thanks for your ready cooperation.

Sincerely,

N. Bhushan Mandava

N. Bhushan Mandava, Ph.D., RAC
Agent for AgValue, Inc.

Enclosure
cc: Brian Heinze

DENSITY, BULK DENSITY, OR SPECIFIC GRAVITY

Objective

The objective of this portion of the study was to determine the bulk density of the test substance, Clopyralid Technical, in accordance with Product Properties Test Guidelines, Series 830, Subsection 7300 of the United States Environmental Protection Agency Office of Prevention, Pesticides, and Toxic Substances.

Procedures

Density was determined at 20°C according to the methods in the Annual Book of ASTM Standards, Designations D941-88, D792-86, D1480-86, and D1217-86; and in the OECD Guidelines for the Testing of Chemicals, Volume 1, Section 1, No. 109 (Adopted 12 May 1981) *Density of Liquids and Solids*. An empty Le Châtelier density bottle was weighed in order to determine a weight when empty. The volume of the bottle to the "0" and "24" marks were determined using deionized water and the density of water constant at 20°C. For each of two trials, the bottle was filled with test substance to mark "0" and weighed. Additional test substance was added to fill the bottle to the "24" mark, and the bottle was weighed. Between fillings, the bottle was rinsed with deionized water and acetone and dried completely in an approximately 80°C oven. The bottle and water, or test substance, were allowed to equilibrate to 20°C by allowing the bottle to sit for approximately 10 minutes prior to any weighing.

The weight of the empty bottle was subtracted from the weight of the bottle with the test substance to the "0" mark. In addition, the weight of the empty bottle was subtracted from the weight with the test substance at the "24" mark. The density was calculated from the mean of the bottle weights.

Results

The average density of Clopyralid Technical was determined to be 0.501 g/mL.

Table 11: Density, Bulk Density or Specific Gravity Results

| | Calibration with water | | | | | Bottle weights (g) with Test Substance | | Density ² | |
|---------|------------------------|-------------|--------------|---------------------|--------------|---|--------------|----------------------|--------------|
| | Bottle Weights (g) | | | Volume ¹ | | | | | |
| | Empty | Mark "0" | Mark "24" | Mark "0" | Mark "24" | Mark "0" | Mark "24" | Mark "0" | Mark "24" |
| Trial 1 | 141.6 | 394.7 | 417.7 | 253.6 | 276.6 | 270.3 | 280.5 | 0.50758 | 0.50217 |
| Trial 2 | 141.6 | 394.7 | 417.7 | 253.6 | 276.6 | 268.3 | 278.8 | 0.49969 | 0.49603 |
| | | | | | | Average Density (g/mL) | | 0.50488 | 0.49786 |
| | | | | | | Combined Average Density (g/mL) | | 0.50137 | |

Notes:

¹Calibration of Bottle Volume (H₂O)

$$\text{Volume} = \frac{\text{Wt. with water} - \text{Wt. Empty}}{\text{Density of water at 20°C}}$$

²Density Formula (Test Substance)

$$\text{Density} = \frac{\text{Wt. with TS} - \text{Wt. empty}}{\text{Volume of bottle}}$$

ATTACHMENT 1

Clarification on the Usage of Density, Relative Density and Bulk Density

Density is defined as the mass per unit volume of a substance. It must be expressed with the units stated. It refers only to the actual volume occupied by the substance. For solid substances with irregular shapes, this usually involves weighing the solid, filling in the irregular spaces with liquid –usually water – to a known volume and weighing, then filling the same volume with only the liquid and weighing. The weight of liquid occupying the same volume as the solid can then be easily calculated. If the density of the liquid is known, the volume of the liquid, and thereby of the solid, can be calculated by dividing the weight of the liquid by its density. Obviously, this only works if the solid does not dissolve in the liquid.

Since water is the liquid most commonly used, and since its density is well known, relative density, or specific gravity, has become a convenient means of expressing the same property. It is defined as the ratio of the density of a substance at a specific temperature to the density of water at a specific temperature. Since it is a ratio, there are no units, but the temperatures must be specified to be exact.

Density or relative density can be determined on finely divided solids, provided the solid is not soluble and provided that it can be thoroughly wetted by the liquid, so that there are no errors due to air bubbles.

Bulk density refers to the mass of a particulate solid that can fill a unit volume. It is determined simply by weighing the amount of the substance that can be put into a container of known volume. Methods are available that prescribe techniques to obtain reproducible results either as “free pouring” bulk density or as “tap” densities. In either case the bulk density is a measure of how closely the particles of the substance tend to pack. It is affected by the shape and size of the particles. It is necessarily a lower number than the density or relative density. It is useful for predicting what size packaging will be needed for a given weight of the solid.

ATTACHMENT 1 (cont.)

Further Explanation: Based on the above description, we wish to give further explanation to different density determinations.

In general, there are two types of density determinations:

A. Bulk density (with 2 subcategories)

1. Free-pour density: This is a density obtained by freely pouring the test material into cylinder of known volume. No attempt is made to eliminate clumps of test material (TM) or pockets of air. A crude experiment for clopyralid yielded a free-pour density of 0.27 g/mL.
2. Tap density (also called bulk density): This is very similar to the free-pour density in design; however, the measuring cylinder/container is tapped on a hard surface to collapse the TM. Clumps and pockets are eliminated.

B. Relative density

The test material is placed in a cylinder and water or appropriate solvent is added. Water takes up all the space between particles. When the density is calculated, the volume used reflects that of perfectly packed test material.

In theory, this would be identical to the volume of the test material if it were melted and cooled into 1 perfect crystal.

As a result, the relative density is normally much greater than the bulk density.

SUBMISSION TRACKING RECORD

BAR CODE 5628339

ID NUMBER 75147-6

ACTION CODE 166

PM 23

TEAM REVIEWER Jim

DATE ON APPLICATION 1,15,03

EPA RECEIVED DATE 1,21,03

PM RECEIVED DATE 1,24,03

SPECIAL INSTRUCTIONS:

FINAL ACTION

RESPONSE CODE _____

RESPONSE DATE _____

MANDAVA ASSOCIATES

CONSULTANTS IN SCIENCE, TECHNOLOGY AND REGULATORY AFFAIRS

1730 M STREET, N.W., SUITE 906, WASHINGTON, DC 20036-4512

TELEPHONE: (202)-223-1424/1747 · TELEFAX: (202)-223-0141 · E-Mail: mandava@compuserve.com

HAND DELIVERED

February 12, 2003

Ms. Joanne I. Miller
Product Manager 23
Herbicide Branch
Registration Division (7505C)
U.S. Environmental Protection Agency
Washington, DC 20460

SUBJECT: EXPEDITED REQUEST FOR REGISTRATION APPLICATIONS

CLOPYRALID TECHNICAL (EPA File Symbol: 75147-G)

CLOPYR AG HERBICIDE (EPA File Symbol: 75147-U)

Dear Ms. Miller:

On behalf of AgValue-Clopyr, LLC, we are requesting the Agency to expedite the registration applications for Clopyralid Technical (EPA File Symbol: 75147-G) and Clopyr AG Herbicide (EPA File Symbol: 75147-U) on the basis that the registrations of these products will serve the Public Good Cause and also will meet the FQPA goals.

Background Information:

On behalf of AgValue-Clopyr, LLC, we submitted **six applications** for the registration of the following products:

| | <u>Product Name</u> | <u>EPA File Symbol</u> | <u>TRB Review Due</u> |
|----|----------------------|------------------------|-----------------------|
| 1) | Clopyralid Technical | 75147-G | 5/6/03 |
| 2) | Clopyr AG Herbicide | 75147-U | 5/7/03 |
| 3) | Clopyralid IVM | 75147-A | |
| 4) | Clopyralid BRUSH | 75147-E | |
| 5) | Clopyr-D | 75147-R | |
| 6) | Clopyr-M | 75147-L | |

We submitted the registration applications (dated August 28, 2003) for the above products and the Agency reviewed the applications under fast track because they are ME-TOO applications. Subsequently, we received comments from the Agency regarding the product chemistry and labeling for these products. In our responses, we addressed and/or corrected the deficiencies identified in your letters. We have also submitted additional data for some products as required by the Agency.

In our February 3, 2003 meeting with the Agency officials, we discussed all the comments on these products. Based on the discussions at this meeting, it is our understanding that all the issues regarding the product chemistry and labeling are resolved. Therefore, we have satisfied the Agency by providing all the requested information.

Expedite Request ONLY for Two Products

Clopyralid Technical (EPA File Symbol: 75147-G) and
Clopyr AG Herbicide (EPA File Symbol: 75147-U)

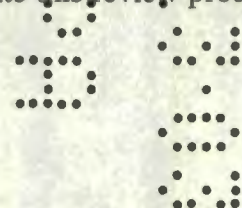
- Due from TRB 5/6
- Due from TRB 5/7

This letter is to specifically request you to expedite the review **only for two products**, Clopyralid Technical (EPA File Symbol: 75147-G) and Clopyr AG Herbicide (EPA File Symbol: 75147-U) so that the registrations are issued expeditiously. The Agency may take its normal time for the issuance of the registrations for other four products.

Clopyralid Technical (EPA File Symbol: 75147-G)

In our January 15, 2003 letter to you, we addressed and/or corrected all the deficiencies identified in your January 7, 2003 letter. Our understanding, based on February 3, 2002 meeting, is that all the product chemistry issues are resolved to the satisfaction of the Agency. There is NO additional product chemistry data submitted because it was not required. All the required changes in labeling were made as requested by you. We believe that no additional time and/or resources are needed to review our response (dated January 15, 2003).

Our understanding is that the Agency follows the standard procedures and time frames for document transmittals and reviews - including for Technical Review Branch (TRB) to receive and review our January 15, 2003 response, and send its recommendation to Product Manager, so that PM will approve the registration. We are requesting you to expedite this review process so that you can grant the registration for Clopyralid Technical.



Clopyr AG Herbicide (EPA File Symbol: 75147-U)

In our January 24, 2003 letter to you, we addressed and/or corrected all the deficiencies identified in your January 23, 2003 letter. Our understanding, based on February 3, 2003 meeting, is that all the product chemistry issues are resolved to the satisfaction of the Agency. There is no additional product chemistry data submitted because it was not required. All the required changes in labeling were made as requested by you. We believe that no additional time and/or resources are needed to review our response (dated January 24, 2003).

It is our understanding that the Agency follows the standard procedures and time frames for document transmittals and reviews - including for TRB to receive and review our January 24, 2003 response, and send its recommendation to Product Manager, so that PM will approve the registration. We are requesting you to expedite this review process so that you can issue the registration for Clopyr AG Herbicide.

Why are we requesting you to expedite the registrations?

We need to import Clopyralid Technical (EPA File Symbol: 75147-G) [REDACTED] for 2003 growing season which will begin in April. We will need about a month to bring the product into the U.S. We will also need sufficient time to produce Clopyr AG Herbicide (EPA File Symbol: 75147-U) and to make it available to growers through normal distribution channels.

In order to meet these time lines, we are requesting the Agency to grant the registrations expeditiously.

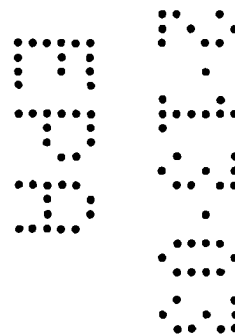
Why are we requesting you to expedite registrations only for two products?

Clopyralid Technical (EPA File Symbol: 75147-G) is the source material and it is required for producing the end-use product(s) including Clopyr AG Herbicide (EPA File Symbol: 75147-U). We are going to use this formulated product (Clopyr AG Herbicide) on sugar beets which is a minor use crop.

The Agency can take its usually required time to take action on other four products (see above for product details).

What is the basis for expedited request?

The bases for expedited request are the following:



1) Public Good

The EPA grants expedited registrations in the interest of Public Good. We have received support from sugar beet growers associations and also individual growers demonstrating the need for clopyralid as an alternative source. Availability of clopyralid to grower community helps to insure the high quality of sugar beet crop and to reduce the pressure from weeds thus increasing the crop productivity. In our opinion, making clopyralid available to sugar beet growers is a Public Good Cause.

We have enclosed copies of four letters from sugar beet growers and their associations supporting our request for expedited registrations for clopyralid.
[We will forward the original letters under separate cover].

2) Support Registrations for Minor Crop

Our understanding of **Minor Use** of a pesticide is that it is applied on a commercial agricultural crop or a site to protect health when the crop is a minor crop. Sugar beet is considered as a minor crop. Among several incentives the Agency offers to registrants under FQPA is an "Expedite Registration". This is because there are not many alternative sources for pesticides for use on minor crops and the Agency recognizes the need for pesticides for minor use crops. In order to encourage the registrants, the Agency registers pesticides on a priority basis.

On the basis of the above justification, we request the Agency to grant our request for expedited registrations for the subject products.

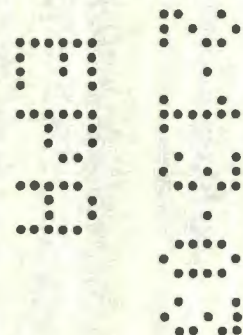
Thanks for your ready cooperation.

Sincerely,

N. Bhushan Mandava

N. Bhushan Mandava, Ph.D., RAC
Agent for AgValue-Clopyr, LLC

Enclosure
cc: Brian Heinze



MANDAVA ASSOCIATES

CONSULTANTS IN SCIENCE, TECHNOLOGY AND REGULATORY AFFAIRS

1730 M STREET, N.W., SUITE 906, WASHINGTON, DC 20036-4512

Telephone: (202)-223-1424/1747 · Fax: (202)-223-0141 · E-MAIL: Mandava@compuserve.com

NOTE TO MS. JOANNE I. MILLER **PRODUCT MANAGER 23**

February 12, 2003

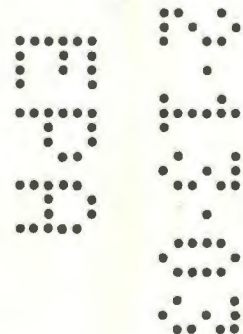
We have enclosed copies of the following letters in support of Expedited Registrations for Clopyralid Technical (EPA File No.: 75147-G) and Clopyr AG Herbicide (EPA File Symbol: 75147-U):

- 1) Mike Hofer, Southern Minnesota Beet Sugar Cooperative
- 2) Robert Busch, Nebraska Sugarbeet Growers Association
- 3) Allan Cattanach, American Crystal Sugar Company
- 4) Kevin Martin, Sugarbeet grower

We will forward the original letters under separate cover.

Bhushan Mandava

Bhushan Mandava





February 12, 2003

Ms. Marcia E Mulky
Director
Office of Pesticide Programs
US Environmental Protection Agency
Washington, DC 20460

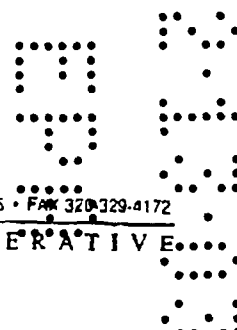
Dear Ms. Mulky:

I am an agricultural consultant for Southern Minnesota Beet Sugar Cooperative. I work for several sugarbeet farmers and help them address different production problems including weeds, diseases, and insects. Over the past several years, weeds have continued to increase in pressure and increase in the number of species we have to control each year. A key component of control, is the use of post emergent herbicides. Without excellent timing of postemergent herbicides our weed control is very poor. Due to sugarbeets being a relatively small crop the basic chemical manufacturers try to produce just enough herbicide so that they do not carryover much product. As a result of this practice, combined with the ever evolving weed spectrum, we are running into supply blocks in the clopyralid channel, and our growers are missing critical timeframes for there postemergent sprays. This leads to poor weed control, which in turn costs our growers over a million dollars each year. Clopyralid is one of the herbicides with this problem. Several growers are using sub lethal rates of clopyralid which only suppresses weeds to obtain mediocre control.



83550 CTY RD 21, P.O. BOX 500, RENVILLE, MN 56284-0500 • 320-329-8305 • FAX 320-329-4172

SOUTHERN MINNESOTA BEET SUGAR COOPERATIVE



Ms. Marcia E Mulky

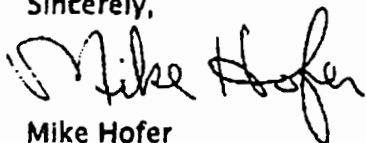
Page 2

February 12, 2003

Our board of directors has informed me that AgValue-Clopyr, LLC applied for the Section 3 registration for clopyralid technical and Clopyr Ag. An expedited review of this additional source of clopyralid would be a great asset to my sugarbeet growers to help eliminate the supply issues that occur every year. Immediate registration of this product would allow time for AgValue to formulate the product and have it available for my growers by April.

Thank you for your consideration on behalf of the Southern Minnesota Sugar Growers.

Sincerely,


Mike Hofer

9 3
5 5
3 5
** TOTAL PAGE 02 **
5 5



NEBRASKA

SUGARBEET GROWERS ASSOCIATION

115 Railway Street



Scottsbluff, NE 69361



Phone/Fax (308) 632-4988

Mr. Bob Busch
President
Nebraska Beet Growers Assn.
120265 CR J
Mitchell, NE 69357

February 10, 2003

Ms. Marcia E. Mulky
Director
Office of Pesticide Programs
U.S. Environmental Protection Agency
Washington, DC 20460

RE: Clopyralid Registration by AgValue-Clopyr, LLC

Dear Ms. Mulky:

Our Sugar Beet Growers Association represents the distributors and growers of sugar beets in the Western Panhandle of Nebraska and Eastern Wyoming.

Proper weed management in sugar beet production with herbicides has resulted in greatly reducing water, light and nutrient resources, and contributed to increased crop production of sugar beets and further increased the yield and sugar content significantly in the beets. It is estimated that weeds account for up to 20% yield losses of the sugar beet crop, when not controlled properly.

Herbicides used in weed management are in short supply and clopyralid is one of the most widely used herbicides for controlling the post-emergent weeds in sugar beet crop cultivation. We recognize that there are inconsistent supplies of clopyralid. Growers rely heavily upon clopyralid for consistent and efficient weed control. A secondary source would be a great asset, if it is readily available for the growing season which begins April 1, 2003.

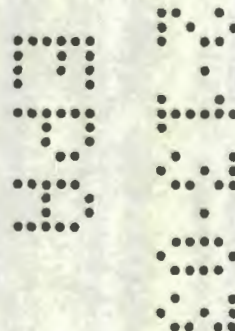
We understand that AgValue-Clopyr, LLC applied for the registration of clopyralid technical and also for CLOPYR AG (end-use product).

We request the Agency to grant the registration of these two products without delay so that the sugar beet grower community would benefit with the timely availability of adequate supply of this product.

Thanks for your consideration of our request.

Sincerely,

Robert H. Busch
President.



February 12, 2003



101 North Third Street
Moorhead, Minnesota
56560-1990

Phone: 218-236-4400

Ms. Marcia E. Mulky
Director, Office of Pesticide Programs
US Environmental Protection Agency
Washington, DC 20460

Dear Ms. Mulky:

American Crystal Sugar Company produces about 500,000 acres of sugarbeets annually. The annual survey of production practices conducted by Dr. Alan Dexter at North Dakota State University has indicated weeds were the most serious production problem in 22 of the last 26 years. We estimate losses of over 20 million dollars annually to inadequate weed control. Post emergence applications of herbicides is a widely accepted practice by American Crystal Sugar Company growers.

The Ag Value, Inc. Company has recently become an additional supplier of herbicides to our producers. Clopyralid is a key herbicide ingredient that is used in multiple applications of herbicide on sugarbeets each year. I understand that Ag Value - Clopyr, Inc. has applied for a Section 3 registration for Clopyralid technical material and Clopyr Ag. It would be of great benefit to the sugarbeet industry of Minnesota and North Dakota if EPA could expedite this registration for the 2003 growing season. This registration would ensure consistent supplies for growers.

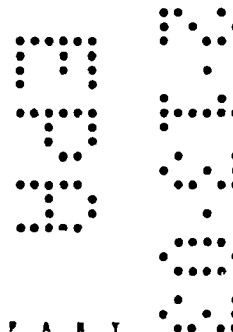
Please contact me at your convenience if I can be of any further assistance.

Sincerely,

Allan Cattanach
General Agronomist

AC:cs

cc: Joanne Miller
David Berg



A M E R I C A N C R Y S T A L S U G A R C O M P A N Y

February 7, 2002

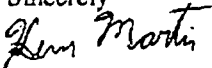
Ms. Marcia E Mulky
Director
Office of Pesticide Programs
United States Environmental Protection Agency

Dear Ms. Mulky,

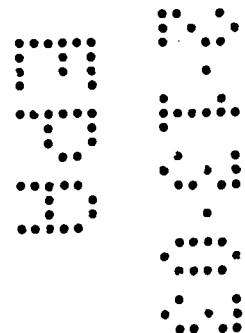
I am a sugarbeet grower in the state of Minnesota. My family and I have been raising sugarbeets for several years. During this time, we have implemented the most technologically advanced production methods available to insure a high quality sugarbeet crop. One of our key production problems is weed control, which varies greatly by weed species and pressure from year to year. This great variability leads to several supply chain shortages for many of the pesticides that I use each year as the manufacturers do not like to have excess inventories at the end of the spring on a minor use crop like sugarbeets. Unfortunately this inhibits my ability as a farmer to produce the crop that I want to produce each year, as I end up using sub-lethal doses of clopyralid to suppress my wild buckwheat and other weeds.

I heard from our growers' association that AgValue-Clopyr, LLC has applied for a clopyralid registration. It would benefit the sugarbeet growers greatly if an additional source of clopyralid was available to us for the 2003 growing season. Thank you for your assistance to the sugarbeet growers.

Sincerely



Kevin Martin
Martin Farms, Inc.
4532 40th Ave S
Moorhead, MN 56560



Joanne Miller

01/28/2003 10:28 AM

To: Bhushan Mandava <Mandava@compuserve.com>
cc: Bhushan Mandava <103733.1102@compuserve.com>, Deborah
McCall/DC/USEPA/US@EPA, Shyam
Mathur/DC/USEPA/US@EPA, James Stone/DC/USEPA/US@EPA
Subject: Re: Meeting Request

Dr. Mandava,

I have set up a meeting on Monday, February 3rd from 11 AM to Noon, in room 205 at CM-2. If you have a conflict with this schedule, please let me know.

Joanne I. Miller
Herbicide Branch
U.S. EPA

Bhushan Mandava <Mandava@compuserve.com>



Bhushan Mandava
<Mandava@compuserve.com>

01/27/03 02:59 PM

To: Joanne Miller/DC/USEPA/US@EPA
cc: Bhushan Mandava <103733.1102@compuserve.com>
Subject: Meeting Request

January 27, 2003

Ms. Joanne I. Miller (PM 23)
Herbicide Branch
Registration Division (7505C)
U.S. Environmental Protection Agency
Washington, DC 20460

SUBJECT: Registration Applications for Clopyralid Technical and
Its End-Use Products

Meeting Request

Dear Ms. Miller:

On behalf of AgValue-Clopyr, LLC, I request a meeting with you and the officials from Technical Review Branch (TRB) to discuss the issues related to the registration applications for Clopyralid Technical (EPA File Symbol: 75147-G) and other end-use products containing clopyralid (File Symbols: 75147-A, E, U, R and L).

Meeting Dates: Any day next week - January 27-31, 2003
(depending on the convenience to you and other officials
in TRB)

Meeting Time: Any time - Morning (10:00 AM - 12:00 Noon) or Afternoon
(1:00 PM - 3:30 PM)
(depending on your convenience and conference room
availability)

Meeting Participants:
Representing EPA -
from TRB

Ms. D. McCall and Dr. S. Mathur

Ms. J. Miller and Mr. J. Stone from HB

Representing AgValue-Clopyr, LLC - Bhushan Mandava

I would greatly appreciate it if you would arrange this meeting at your convenience. Thanks for your cooperation.

Sincerely,

Bhushan Mandava
Agent for AgValue-Clopyr, LLC
c/o Mandava Associates
1730 M Street, NW / Suite 906
Washington, DC 20036
Phone: 202-223-1424
Fax: 202-223-0141
E-Mail: Mandava@compuserve.com



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JAN 7 2003

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

AgValue-Clopyr, LLC
c/o Mandava Associates
1730 M Street, N.W., Suite 906
Washington, D.C. 20036

Gentlemen:

Subject: Application for Registration
Clopyralid Technical
EPA File Symbol 75147-G
Your Submission Dated August 28, 2002

The application referred to above has been determined, pursuant to 40 CFR 152.105, not to be sufficiently complete to process; therefore, the application is considered deficient. Labeling/other information as specified below must be submitted before the processing of the application can be completed. If such deficiencies cannot be corrected within 75 days, you must notify the Agency within those 75 days of the date you expect to complete the application. If, after 75 days, you do not respond, or you subsequently fail to complete the application within the time scheduled for completion, the Agency will terminate any action on the application, and will treat the application as if it has been withdrawn by the applicant. Any subsequent submission relating to the application must be submitted as a new application.

1. Technical Review Branch, Registration Division has completed the product chemistry review and we have the following comments:

a. There is a significant difference in the density values of the proposed product [31.2 lbs/cu.ft.] and the registered product. Verify the accuracy of measurement of the density of Clopyralid produced by [REDACTED]

b. Submit a updated Confidential Statement of Formula with the following corrections:

i. The lower certified limit of the first impurity listed on the CSF is incorrect and must be deleted from the CSF.

ii. Specify the Total Weight in Box 17.

iii. The % by weight column 13.b. must total 100%

c. You must conduct one year storage stability [830.6317] and corrosion characteristics [830.6320] studies under warehouse conditions in commercial containers. The results of these studies must be submitted to the Agency upon completion.

Product ingredient source information may be entitled to confidential treatment

3. Submit five draft labels with the following corrections:

a. If all of the Precautionary Statements do not appear on the front panel, add a referral statement similar to the following:

See side panel for additional precautionary statements

b. At the beginning of the Hazards to Humans section add "Corrosive".

c. In the Manufacturing Use Only section delete "trees", "industrial sites", "non-cropland", "rights-of-way" and "turf". Delete the comma "," between sugar and beets.

d. If you intend this product to be use to manufacture herbicides for non-agricultural uses, add a section similar to the following:

For manufacture of herbicides for use only on non-residential turf such as athletic and recreational sports fields, cemeteries, golf courses, industrial sites, non-cropland, parks, rights-of-way, and roadsides.

This product must not be formulated into manufacturing-use products or end-use herbicide products for use on residential turf.

If the product is labeled for reformulation into products bearing labeling for turf applications other than residential turf, the formulated product label must contain the following statements:

- Do not use on residential turf
- Do not send clippings to a compost facility
- Do not collect grass clippings for mulch or compost
- Applicator must give notice to landowners/property managers to not use grass clippings for composting.

If you have any questions concerning this letter, please contact Mr. James Stone at 703-305-7391.

Sincerely yours,



Joanne I. Miller
Product Manager (23)
Herbicide Branch
Registration Division (7505C)

AGVALUE CLOPYRALID TECHNICAL

ACTIVE INGREDIENT:
 Clopyralid: 3,6-dichloro-2-pyridinecarboxylic acid 96.0%
 INERT INGREDIENTS: 4.0%
 TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN
DANGER

| FIRST AID | |
|---|---|
| If in eyes: | <ul style="list-style-type: none"> •Hold eye open and rinse slowly with a steady, gentle stream of water for 15-20 minutes. •Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye •Call a poison control center or physician for treatment advice. |
| If swallowed: | <ul style="list-style-type: none"> •Call a physician or poison control center immediately for treatment advice •Have person sip a glass of water if able to swallow. •DO NOT induce vomiting unless told to do so by poison control center or physician. •Do not give anything by mouth to an unconscious person. |
| If inhaled: | <ul style="list-style-type: none"> •Move person to fresh air. •If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably, mouth-to-mouth, if possible. •Call a poison control center or physician for treatment advice. |
| If on skin or : clothing | <ul style="list-style-type: none"> •Take off contaminated clothing. •Wash skin with plenty of water for 15-20 minutes. •Call a poison control center or physician for treatment advice. |
| Have the product container or label with you when calling a poison control center or doctor, or going for treatment | |

Net Contents: 20 KG

EPA Est. No.
EPA Reg. No. 75147-

Manufactured For:
AgValue-Clopyr, LLC
Visalia, CA 93291

Referral Statement

PRECAUTIONARY STATEMENTS**Hazard to Humans and Domestic Animals
DANGER**

Convulsive
Causes irreversible eye damage. Harmful is absorbed through skin or inhaled. Do not get in eyes or on skin and clothing. Wear goggles or face shield when handling. Avoid breathing dust. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

For Manufacturing Use Only

For formulation into an end-use herbicide only for use on asparagus, barley, trees, corn, fallow land, grasses, industrial sites, mint, non-cropland, oats, pasture, rights-of-way, rangeland, sugar beets, turf, wheat. Because of their properties and intended uses, herbicidal formulations containing Clopyralid Technical herbicide will require precautionary labeling differing from that given. Formulators using this product should develop their own use and precautionary labeling, based on the properties and intended uses of their own finished formulations, and are responsible for obtaining EPA registration of these products.

on Panel

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE DISPOSAL

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL

Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by procedures approved by state and local authorities.

Triple rinse station used also

DP BARCODE: D285622

14164

CASE: 067389
SUBMISSION: S621885

DATA PACKAGE RECORD
BEAN SHEET

DATE: 09/20/02
Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION ACTION: 165 NEW PROD-OC-MINOR CHG
RANKING : 10 POINTS ()
CHEMICALS: 117403 Clopyralid (ANSI)

96.0000%

ID#: 075147-G AGVALUE CLOPYRALID TECHNICAL

COMPANY: 075147 AGVALUE-CLOPYR, LLC

PRODUCT MANAGER: 23 JOANNE MILLER

703-305-6224 ROOM: CM2 237

PM TEAM REVIEWER: JAMES STONE

703-305-7391 ROOM: CM2 257

RECEIVED DATE: 09/03/02 DUE OUT DATE: 03/02/03

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 285622 EXPEDITE: N DATE SENT: 09/20/02 DATE RET.: / /

CHEMICAL: 117403 Clopyralid (ANSI)

DP TYPE: 001 Submission Related Data Package

CSF: Y

LABEL: Y

ASSIGNED TO DATE IN DATE OUT

ADMIN DUE DATE: 02/07/03

DIV : RD

NEGOT DATE: 12/29/02

BRAN: TRB

PROJ DATE: / /

SECT: CHEM

REVR : S.B. Mateny 12/16/02

12/27/02

CONTR:

* * * DATA REVIEW INSTRUCTIONS * * *

Application for Registration of new unregistered source of
clopyralid. Review product chemistry data. Process
according to enclosed SOP 3068.2

* * * DATA PACKAGE EVALUATION * * *

No evaluation is written for this data package

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

| DP BC | BRANCH/SECTION | DATE OUT | DUE BACK | INS | CSF | LABEL |
|--------|----------------|----------|----------|-----|-----|-------|
| 285623 | TRB/TOX | 09/20/02 | 02/07/03 | Y | Y | Y |

62719-80

Date: December 27, 2002

SUBJECT: Product Chemistry Review of AGVALUE Clopyralid Technical

FROM: Shyam B. Mathur, Ph.D
Product Chemistry Team
Technical Review Branch/RD (7505C)

S. B. Mathur
12-27-02

TO: Joanne Miller / James Stone, PM 23
Herbicide Branch / RD (7505C)

DP BARCODE: D285622
EPA REG. NO.: 75147-G
REGISTRANT: AGVALUE-CLOPYR, LLC
USE: Herbicide

INTRODUCTION:

The registrant has submitted the product chemistry data to support the registration of Agvalue Clopyralid technical produced [REDACTED]. This product may be used only for the formulation of end use herbicide products for the use on : asparagus, barley, trees, corn, fallow land, grasses, industrial sites, mint, non-cropland, oats, pasture, rights-of-way, rangeland, sugar, beets, turf, and wheat. The registrant has claimed that the proposed technical is substantially similar to the registered technical product with Reg. No. 62719-80.

The product chemistry data for the Agvalue Clopyralid technical are submitted under MRID Nos.: 457515-01 through 457515-04 and 457556-01.

For analysis, [REDACTED] has provided five production batches of Clopyralid technical to Stillmeadow Incorporation in Texas, USA. [REDACTED] also did independent five batch analysis of the technical.

SUMMARY OF FINDINGS:

1. The registrant has submitted the Confidential Statement of Formula for basic formulation (dated 08-28-02), for Clopyralid technical. The nominal concentration (96.0%) of the AI agrees with the product label claim nominal concentration. The product chemistry data submitted corresponding to guideline reference 830.1550 (Product identity & Composition), and 830.1750 (Certified limits) do not satisfy the data requirements of 40CFR§158.155 and 158.175 respectively.
2. The product chemistry data submitted corresponding to guideline reference 830.1600 (Description of material used to produce the product) satisfy the data requirements of 40CFR§ 158.160. The registrant has provided the product specifications data on all the starting materials used for the production of this herbicide. [MRID No. 457556-01]
3. The product chemistry data submitted corresponding to guideline reference 830.1620 (Description of production process) satisfy the data requirements for 40CFR§158.162. The registrant has provided the details of the manufacturing process. [MRID No. 457556-01]
4. The product chemistry data submitted corresponding to guideline reference 830.1670 (Discussion on the formation of impurities) satisfy the data requirements for 40CFR§158.167. [MRID No. 457556-01]
5. The data submitted corresponding the guideline reference 830.1700 (Preliminary analysis) satisfy the data requirements of 40CFR§158.170. Five representative lots of the technical were analyzed for percent active ingredient by GC/FID method, and other impurities present at levels of 0.1% or greater were determined by HPLC method by [REDACTED] and Stillmeadow. The method was validated for Accuracy, Linearity, and Precision. [MRID No. 457515-01, 457515-02, and 457556-01]

6. The data submitted corresponding the guideline reference 830.1800 (Enforcement Analytical method) satisfy the data requirements of 40CFR§158.180. The HPLC / UV for method impurities and GC/FID method was used to assay the active ingredient in the technical. The methods were validated for accuracy, linearity, and precision. [MRID No. 457515-01].

8. The registrant has submitted product chemistry data corresponding to guideline reference 830 Series Subgroup B (Physical/Chemical properties) for the technical. The data submitted satisfy the data requirements of 40CFR 158.190. [MRID Nos. 457515-03 and 457515-04].

CONCLUSIONS:

The TRB has reviewed the product chemistry data submitted for the AgValue Clopyralid technical and has concluded that:

1. All the product chemistry data submitted corresponding to 830 Series Subgroup A and Subgroup B satisfy the data requirements of 40CFR§158.155 to 158.190 and are acceptable, except the CSF for basic formulation.

2. The CSF for basic formulation (dated 08-28-02) is not filled out correctly and completely. It is in compliance with PR Notice 91-2. The nominal concentration of the active ingredient concurs with the product label claim nominal concentration. The CSF for basic formulation is not acceptable for the following reasons:

- i. The lower certified limit for one impurity provided is incorrect, it must be deleted from the CSF.
- ii. The total weight in Block #17 of CSF has not been provided.

3. The applicant must conduct one year storage stability (830.6317) and corrosion characteristics (830.6320) studies under warehouse conditions in commercial containers. The results of these studies must be submitted to the Agency on completion.

4. The proposed technical (75147-G) was determined to be substantially similar to the registered product with Reg. No.62719 -80 from the product chemistry point of view. The manufacturing process adopted produces more environmental friendly product with less number of impurities than the registered product. However, it is important to mention that there is significant difference in the density values of the proposed and registered products. (Registered product $d = 18.6$ lbs/cu. ft; for the proposed product $d = 31.2$ lbs/cu.ft).

Note to PM: The registrant must be asked about the accuracy of measurement of density of the Clopyralid produced by [REDACTED]

5. The data corresponding to 830 Series Subgroup B (Physical / Chemical properties) for Clopyralid technical were generated at Stillmeadow Incorporation, TX, USA (MRID No. 457515-04) and were also submitted by [REDACTED] under MRID No. 457515-03. In this report only the MRID No. 457515-03 has been shown.

BARCODE: D285622; **Reg. No. :** 75147-G **PRODUCT:** AgValue Clopyralid Technical

830.1550. Product Identity: [MRID No. 457556-01]

Common Name: AgValue Clopyralid Technical

Chemical Name: (CA): 3,6-Dichloro-2-pyridinecarboxylic acid

Synonymus: 3,6-Dichloropicolinic acid (IUPAC) ; 3, 6-Dichloropyridine-2-carboxylic acid

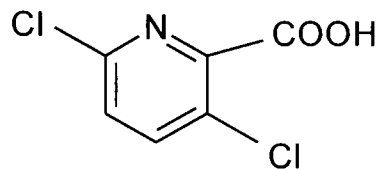
CAS No.: 1702-17-6

PC Code No.: 117403

Empirical formula: $C_6 H_3 N O_2 Cl_2$

Molecular Weight: 192

Structural formula:



ATTACHMENT II
REVIEW OF PRODUCT CHEMISTRY, OPPTS 830 SERIES

| | |
|-----------------------------------|--|
| Chemical Name (IUPAC, ANSI, etc.) | 3,6-Dichloro-2-pyridinecarboxylic acid |
| Chemical Number (CAS; PC Code) | CAS No. 1702-17-6 PC Code No.: 117403 |
| Registration/Symbol No. | 75147-G |
| Type of Product (T, MP, EP) | 96.0% TGAJ / MP |
| DP Barcode | D285622 |
| Reviewer | Shyam B. Mathur |
| Branch Chief | Deborah McCall |

| Table 1: Manufacturing and Impurity Data for the AgValue Clopyralid Technical | | | | |
|---|--|--|---------------------|---|
| GLN | Requirement | MRID | Status ¹ | Details and/or Deficiency ² |
| 830.1550 | Product identity and composition | Basic CSF (08-28-02)) | N | The NC of AI concurs with the product label claim and is supported by 5 batch analysis. The LCL for 1 impurity is incorrect and no total wt. Block #17 was provided |
| 830.1600 | Description of materials used to produce product | 457556-01 | Y | The product specification sheets(MSDS) for all the starting materials have been provided by [REDACTED] |
| 830.1620 | Description of production process | 457556-01 | Y | The registrant has provided detailed information about the synthesis of the technical. The amounts of each starting material and conditions under which the reaction were performed are provided. |
| 830.1670 | Discussion of formation of impurities | 457556-01 | Y | The registrant has provided required information on the formation of impurities. The mechanisms for the formation of impurities during different stages of the production process have been submitted. |
| 830.1700 | Preliminary analysis | 457556-01 [REDACTED] 457515-01(S) 457515-02(S) | Y | Registrant has provided 5 batch analysis for the TGAJ. For TGAJ the GC / FID method was used and the HPLC / UV (254 nm) method used for impurities. The reverse phase HPLV / UV (254 nm), HPLC / MS were also used to identify and quantify the AI and impurities. The analytical method was validated for linearity, accuracy and precision. The analysis by Stillmeadow(S) assayed the AI which exceeds 97%, whereas [REDACTED] indicated clopyralid at > 96% purity. |
| 830.1750 | Certified limits | Basic CSF (08-28-02) | U | The certified limits for the TGAJ were within the standard certified limits. The limits were verified by 5 batch analysis. The NC's and UCLs for impurities have been provided. For one impurity, the LCL is incorrect. |
| 830.1800 | Enforcement analytical method | 457556-01 | Y | The GC / FID method used for the assay of the AI. The method validated for accuracy, linearity, & precision. |
| A = Acceptable; N = Unacceptable (see Deficiency); N/A = Not Applicable. [REDACTED]; S = Stillmeadow, Sugarland, TX, USA | | | | |

Product ingredient source information may be entitled to confidential treatment

| Table 2: Physical and Chemical Properties of the AGVALUE Clopyralid Technical. *See Note for acceptance condition | | | | |
|--|---|-----------|---------------------|---|
| GLN | Requirement | MRID | Status ¹ | Result ² or Deficiency |
| 830.6302 | Color | 457515-03 | A | Off-white |
| 830.6303 | Physical state | " " | " | Solid powdery lump |
| 830.6304 | Odor | " " | " | No apparent odor at distance of 10 " ; at 5 " a slight wet moldy rag odor |
| 830.6313 | Stability to normal and elevated temperatures, metals, and metal ions | " " | " | stable to elevated temperatures; stable in presence of Fe powder, Pb shot, Ferric chloride, & lead nitrate |
| 830.6314 | Oxidation/reduction: chemical incompatibility | " " | " | The TS was stable to oxidizing & reducing agents(when tested with water, carbon dioxide, elemental Fe, bleach and gasoline) |
| 830.6315 | Flammability | " " | W | waiver accepted |
| 830.6316 | Explosibility | " " | W | waiver accepted |
| 830.6317 | Storage stability | 457515-03 | I | Accelerated study for 14 days at 54C indicate that TS is stable. One year study must be conducted. |
| 830.6319 | Miscibility | NA | " | |
| 830.6320 | Corrosion characteristics | 457515-03 | " | non-corrosive to Fe. One year must be conducted |
| 830.7000 | pH | 457515-03 | W | TS non-dispersible and not soluble in water so pH could not be measured. Waiver accepted |
| 830.7050 | UV/Visible absorption | 457515-03 | A | See Note 1 |
| 830.7100 | Viscosity | NA | " | |
| 830.7200 | Melting point/ Melting range | 457515-03 | A | 155C (range of 154-156C; Stillmeadow) 151-152C [REDACTED] |
| 830.7220 | Boiling point/ Boiling range | NA | | |
| 830.7300 | Density/ relative density/ bulk density | 457515-03 | U | 0.501 g/ml at 20C |
| 830.7370 | Dissociation constants in water | " | A | pKa = 2.0 [REDACTED] |
| 830.7550 | Partition coefficient (n-octanol/water), shake flask method | " | A | log Po/w = 2.. 0 (by HPLC method ; Stillmeadow) See Note 2 |
| 830.7840 | Water solubility: column elution method; shake flask method | " | A | water = 0.048 ppm at 20C (Stillmeadow) See Note 2 |
| 830.7950 | Vapor pressure | " | A | 1.33 mPa (PAI at 24C); 1.36 mPa(TGA) at 25C) |
| A = Acceptable; N = Unacceptable (see Deficiency); N/A = Not applicable ; G = Data gap ; W = waiver request I = Incomplete or in progress | | | | |

Note 1. 830.7050. UV/VIS:

The UV/VIS absorption spectra for the TS were recorded in MeOH, basic MeOH, and acidic MeOH.

| <u>Solvent</u> | <u>λ max</u> | <u>Molar Absorption coefficient (cm² / mole)</u> |
|--------------------------|---------------------------------|---|
| Methanol-Water (neutral) | 223 nm | 9255 |
| | 280 nm | 4747 |
| Acidic MeOH-Water | 227 nm | 8650 |
| | 282 nm | 3582 |
| Alkaline MeOH-Water | 220 nm | 9161 |
| | 281 nm | 4700 |

The pH has no effect (or negligible effect) on the UV/Visible absorption spectra for the TS (Clopyralid)

Note 2. Partition coefficient. 830.7570:

Log Po/w : 2.00 by HPLC method (according to Stillmeadow)

Log Po/w : 1.81 (pH = 5), 2.63 (pH = 7), 2.55 (pH = 9), and 1.07 (unionized at 25C) [data provided by ██████████]

Note 3. Solubility in water. 830.7840/60:

0.048 ppm at 20C (Stillmeadow)

Solubility in organic solvents (by ██████████)

n-hexane = 6 g/l; Acetonitrile = 121 g/l; MeOH = 104 g/l



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

TECHNICAL REVIEW BRANCH
SIMILARITY CLINIC DETERMINATION

09/DEC//2002

Subject: EPA Reg. No./File Symbol: 75147-G Clopyralid Technical
DP Barcode: D285623
Case No: 067389
PC Code: 117403

From: Masih Hashim, Toxicologist
Technical Review Branch *HH*
Registration Division (7505 C) *JLR*

To: James Stone, PM Team 23
Herbicide Branch
Registration Division (7505C)

Applicant: AgValue-Clopyr, LLC
Visalia, CA 93291

ACTION REQUESTED: PM requests similarity action between the proposed product 75147-G and the cited EPA Reg. No. 62719-80. The common active ingredient is Clopyralid.

Recommendations: TRB has evaluated the proposed and the cited products and we consider them to be essentially similar. The data can be bridged between them. The Signal Word is Caution.

This memorandum only pertains to the decision concerning whether the subject product is similar to the cited product from an acute toxicological view point. For the purposes of this action, TRB has made no determinations of the adequacy of the toxicological data base or the precautionary label of the cited product.

14140

DP BARCODE: D285623

CASE: 067389
SUBMISSION: S621885

DATA PACKAGE RECORD
BEAN SHEET

DATE: 09/20/02
Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION ACTION: 165 NEW PROD-OC-MINOR CHG
RANKING : 10 POINTS ()
CHEMICALS: 117403 Clopyralid (ANSI)

96.0000%

ID#: 075147-G AGVALUE CLOPYRALID TECHNICAL

COMPANY: 075147 AGVALUE-CLOPYR, LLC

PRODUCT MANAGER: 23 JOANNE MILLER

703-305-6224 ROOM: CM2 237

PM TEAM REVIEWER: JAMES STONE

703-305-7391 ROOM: CM2 257

RECEIVED DATE: 09/03/02 DUE OUT DATE: 03/02/03

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 285623 EXPEDITE: N DATE SENT: 09/20/02 DATE RET.: / /

CHEMICAL: 117403 Clopyralid (ANSI)

DP TYPE: 001 Submission Related Data Package

CSF: Y

LABEL: Y

ASSIGNED TO

DATE IN

DATE OUT

ADMIN DUE DATE: 02/07/03

DIV : RD

/ /

/ /

NEGOT DATE: 12/24/02

BRAN: TRB

/ /

/ /

PROJ DATE: / /

SECT: TOX

/ /

/ /

REVR :

/ /

/ /

CONTR:

/ /

/ /

* * * DATA REVIEW INSTRUCTIONS * * *

For Similarity Clinic

New unregistered source of clopyralid. Using cite-all method of support. Is product substantially similar to registered technical EPA Reg. No. 62719-80?

* * * DATA PACKAGE EVALUATION * * *

No evaluation is written for this data package

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC
285622

BRANCH/SECTION
TRB/CHEM

DATE OUT
09/20/02

DUE BACK
02/07/03

INS
Y

CSF
Y

LABEL
Y

SEP 16 2002

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs

AGVALUE-CLOPYR, LLC
C/O MANDAVA ASSOCIATES
1730 M STREET, N.W. SUITE 906
WASHINGTON, DC 200364512

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your transmittal of 09/03/02. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

MANDAVA ASSOCIATES**CONSULTANTS IN SCIENCE, TECHNOLOGY AND REGULATORY AFFAIRS****1730 M STREET, N.W., SUITE 906, WASHINGTON, DC 20036-4512****TELEPHONE: (202)-223-1424/1747 · TELEFAX: (202)-223-0141 · E-Mail: mandava@compuserve.com**Hand Delivered

August 28, 2002

Ms. Joanne I. Miller
Product Manager 23
Herbicide Branch
Registration Division (7504C)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Washington, D.C. 20460

75147-G

SUBJECT: ME-TOO Application for Registration for AgValue CLOPYRALID
TECHNICAL

Active Ingredient: Clopyralid

EPA Chemical Code: 117403

Company Name: AgValue-Clopyr, LLC

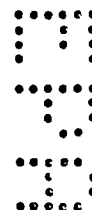
Company Number: 75147

Dear Ms. Miller:

On behalf of AgValue-Clopyr, LLC, we are submitting a ME-TOO application for the registration of AgValue CLOPYRALID TECHNICAL which is the trade name for clopyralid technical.

In support of the application for the subject product registration, we are providing the following administrative materials and product chemistry data on AgValue CLOPYRALID TECHNICAL"

- 1) Authorization Letter designating us as an Agent
- 2) Application for Pesticide Registration
- 3) Confidential Statement of Formula
- 4) Certification with Respect to Citation of Data
- 5) Data Matrix
- 6) Five Copies of Draft Labeling for the Subject Product



- 7) Volume 1: AgValue CLOPYRALID TECHNICAL: Group A - Product Identity, Composition, and Analysis. Product Properties Data in Support of FIFRA Registration. Data Requirement: 40 CFR 158.155-180; OPPTS Test Guidelines 830.1000-1900; OPP Guideline Series 61 and 62 (Project No.: AVI-CLOPYR TECH-PC-1); AgValue-Clopyr, LLC
45755601
- 8) Volume 2A: AgValue CLOPYRALID TECHNICAL: Group A - Product Identity, Composition, and Analysis. Product Properties Data in Support of FIFRA Registration. Data Requirement: 40 CFR 158.155-180; OPPTS Test Guidelines 830.1000-1900; OPP Guideline Series 61 and 62 (Project No.: AVI-CLOPYR TECH-PC-2); AgValue-Clopyr, LLC
45751501
- 9) Volume 2B: Clopyralid Technical: Chemical Characterization of a Test Substance to Determine Amounts of Active Ingredient (OPPTS Series 830 Sections 1700); Stillmeadow Laboratory Study Number 6824-01; AgValue-Clopyr, LLC
45751502
- 10) Volume 3A: AgValue CLOPYRALID TECHNICAL: Group B - Physical and Chemical Properties. Product Properties Data in Support of FIFRA Registration. Data Requirement: 40 CFR 158.190; OPPTS Test Guidelines 830.6302-7950; OPP Guideline Series 63 (Project No.: AVI-CLOPYR TECH-PC-3); AgValue-Clopyr, LLC
45751503
- 11) Volume 3B: Clopyralid Technical: Product Chemistry: Technical Grade Product (OPPTS Series 830 Sections 6302, 6303, 6304, 6313, 6314, 6315, 6325, 7000, 7200, 7300, 7570 and 7840); Stillmeadow Laboratory Study Number 6825-01; AgValue-Clopyr, LLC
45751504

This product chemistry data was developed by AgValue-Clopyr, LLC in support of the application for registration for the subject product.

Please also note that AgValue-Clopyr, LLC is relying on the safety data submitted by other registrants on clopyralid. In accordance with the regulations under 40 CFR Part 152, the applicant has:

- 1) Notified all persons listed in "Data Submitters List" regarding his intention to apply for the subject registration and with an offer to pay compensation for the applicable data to the extent required by FIFRA section 3(c)(1)(D); and,

- 2) Selected "cite-all" method of support and general offer to pay (EPA Form 8570-34 and EPA Form 8570-350).

In addition to the above studies, we are also relying on other items of data on the subject product in the Agency's files.

We are requesting an "Expedited Review" in accordance with FIFRA Section 3(c)(3)(b)(i), because our product (AgValue CLOPYRALID TECHNICAL) is substantially similar or identical in composition and labeling to Lontrel T (EPA Reg. No.: 464-613) which contains 95% clopyralid as an active ingredient.

Since we have fulfilled all the registration requirements, we request you grant the registration for the subject product, so that the applicant can market it for the next growing season.

Sincerely,

N. Bhushan Mandava

N. Bhushan Mandava, Ph.D., RAC
Agent for AgValue-Clopyr, LLC

Enclosure
cc: Brian Heinze



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

09/06/2002

N. BUSHAN MANDAVA
MANDAVA ASSOCIATES
1730 M STREET, N.W., SUITE 906
WASHINGTON DC 200364510

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PRODUCT NAME: AGVALUE CLOPYRALID TECHNICAL
COMPANY NAME: MANDAVA ASSOCIATES
OPP IDENTIFICATION NUMBER: 279672
EPA FILE SYMBOL: 75147-G
EPA RECEIPT DATE: 09/03/2002

SUBJECT: RECEIPT OF APPLICATION FOR A NEW ME-TOO REGISTRATION

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for a new 'me-too' registration and it has passed an administrative screen for completeness.

During the initial screen we determined that the application qualifies for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability.

If you have any questions, please contact Joanne Miller, Product Manager 23, at (703)-305-6224.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joanne Miller".

Front End Processing Staff
Information Services Branch
Program Management and Support Division

SUBMISSION TRACKING RECORD

BAR CODE 5621885

ID NUMBER 75147-6

ACTION CODE 165

PM 23

TEAM REVIEWER Jim

DATE ON APPLICATION 8/28/02

EPA RECEIVED DATE 9/6/02

PM RECEIVED DATE 9/18/02

SPECIAL INSTRUCTIONS:

FINAL ACTION

RESPONSE CODE _____

RESPONSE DATE _____

F/T

Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060, Approval expires 2-28-95



United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

279672

Application for Pesticide - Section I

| | | |
|---|---|--|
| 1. Company/Product Number 75147- <u>G</u> | 2. EPA Product Manager Joanne Miller | 3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name) AgValue Clopyralid Technical | PM# 23 | |
| 5. Name and Address of Applicant (Include ZIP Code) AgValue-Clopyr, LLC c/o Mandava Associates 1730 M Street, N.W., Suite 906 Washington, D.C. 20036 <input type="checkbox"/> Check if this is a new address | 6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. <u>62719-80</u> Product Name <u>Lontrel T Herbicide</u> | |

Section - II

| | |
|---|--|
| <input type="checkbox"/> Amendment - Explain below. | <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ |
| <input checked="" type="checkbox"/> Resubmission in response to Agency letter dated _____ | <input checked="" type="checkbox"/> "Me Too" Application. |
| <input type="checkbox"/> Notification - Explain below. | <input type="checkbox"/> Other - Explain below. |

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Section - III

| | | | | | |
|---|--|---|--|--|--|
| 1. Material This Product Will Be Packaged In: | | | | | |
| Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 2. Type of Container <input checked="" type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____ | | |
| If "Yes" Unit Packaging wgt. | | No. per container | If "Yes" Package wgt. | | |
| No. per container | | No. per container | | | |
| 3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container | | 4. Size(s) Retail Container 20 kg | | 5. Location of Label Directions <input checked="" type="checkbox"/> | |
| 6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____ | | | | | |

Section - IV

| | | | |
|---|--|---|---|
| 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.) | | | |
| Name N. Bhushan Mandava, Ph.D. | | Title Agent for AgValue-Clopyr, LLC. | |
| | | Telephone No. (Include Area Code) (202) 223-1424 | |
| Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. | | | 6. Date Application Received (Stamped) |
| 2. Signature <u>N. Bhushan Mandava</u> | | 3. Title Agent for AgValue-Clopyr, LLC. | |
| 4. Typed Name N. Bhushan Mandava, Ph.D. | | 5. Date August 28, 2002 | |
| | | | |

AgValue-Clopyr, LLC
1124 N. Chinowth Street
Visalia, CA 93291
559-627-6956

August 28, 2002

Director
Office of Pesticide Programs
C/o document Processing Desk (COADR)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Ariel Rios Building
Washington, DC 20004

Dear Sir/Madam:

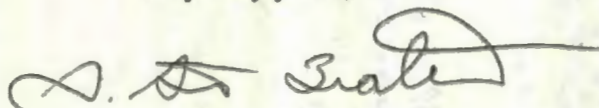
This letter is to authorize the following party to act on behalf of AgValue-Clopyr, LLC, as our agent to represent us before the United States Environmental Protection Agency in regards to all matters pertaining to our product registrations and establishments effective the date of this letter.

MANDAVA ASSOCIATES
1730 M Street, N.W.
Suite 906
Washington, DC 20036-4510
Phone (202) 223-1747/1424
Fax: (202) 223-0141
Contact person: N. Bushan Mandava, Ph.D.

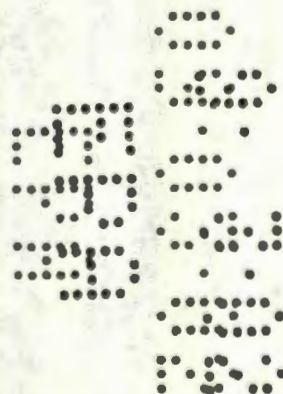
We acknowledge that all official correspondence from the EPA, Office of Pesticide Programs will be directed to the agent at the address as listed above.

This appointment is to remain in effect until revoked by us in writing.

Very truly yours,



G. Steven Bratcher
LLC Member





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

| | |
|--|---|
| Applicant's/Registrant's Name, Address, and Telephone Number AgValue-Clopyr, LLC, 1124 N. Chinowth Ave., Visalia, CA 93291 (1-866-511-3171) | EPA Registration Number/File Symbol 75147- |
| Active Ingredient(s) and/or representative test compound(s) Clopyralid (CAS# 1702-17-6) | Date August 28, 2002 |
| General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) TGAi, MUP | Product Name AgValue Clopyralid Technical |

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☒ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☐ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of that delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

| | | |
|--|-------------------------|---|
| Signature <i>N. Bhushan Mandava</i> | Date August 28, 2002 | Typed or Printed Name and Title N. Bhushan Mandava, Agent for AgValue-Clopyr, LL |
|--|-------------------------|---|



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

| | | | | | |
|---|----------------------|---|---|-------------|--------------------|
| Date August 28, 2002 | | EPA Reg No./File Symbol 75147 | | Page 1 of 1 | |
| Applicant's/Registrant's Name & Address AgValue-Clopyr, LLC., 1124 N. Chinowth Ave., Visalia, CA 93291 | | Product AgValue Clopyralid Technical | | | |
| Ingredient Clopyralid (CAS# 1702-17-6) | | 117403 | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| Cite All | | | Riverdale Chemical Co., 1333 Burr Ridge Pkwy. | Pay | |
| | | | Burr Ridge, IL 60572 (Company# 228) | | |
| | | | Lebanon Seaboard Corp., 1600 E. Cumberland | Pay | |
| | | | St., Lebanon, PA 17042 (Company# 961) | | |
| | | | Dow Agrosciences LLC, 9330 Zionsville Rd | Pay | |
| | | | Indianapolis, IN 46262 (Company# 62719) | | |
| | | | Spray Drift Task Force, Mckenna & Cuneo LLP | Pay | |
| | | | 1900 K Street, NW, Washington DC, 20006 | | |
| | | | (Company No. 066607) | | |
| | | | Beveridge & Diamond, P.C. Agent for Outdoor | Pay | |
| | | | Residential Exposure, 1350 I Street, N..W. | | |
| | | | Washington, DC 20005 (Company# 71754) | | |
| | | | Beveridge & Diamond, P.C. Agent for Agricult- | Pay | |
| | | | ural Re-entry Task Force, 1350 I Street, N..W. | | |
| | | | Washington, DC 20005 (Company# 71755) | | |
| Signature N. Bhushan Mandava | | | Name and Title N. Bhushan Mandava, Agent for AgValue-Clopyr, LLC | | Date 08/28/2002 |

MANDAVA ASSOCIATES

CONSULTANTS IN SCIENCE, TECHNOLOGY AND REGULATORY AFFAIRS

1730 M STREET, N.W., SUITE 906, WASHINGTON, DC 20036-4512

TELEPHONE: (202)-223-1424/1747 · TELEFAX: (202)-223-0141 · E-MAIL: Mandava@Compuserve.com

FAX

DATE: September 11, 2002

TO: Joanne I. Miller
Product Manager 23
Registration Division (7505C)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

FAX NO.: 703-308-1825

SUBJECT: AgValue CLOPYRALID TECHNICAL
EPA File Symbol #75147-G
Volume 1 (Confidential Appendix)

TOTAL PAGES: TWO (including this Pages)

Dear Ms. Miller:

Thanks for your today's fax regarding the missing page (Page 186) in the subject Volume 1, Confidential Appendix.

I am enclosing the missing page and request you to include it in Volume 1.

Thanks for your ready cooperation.

Best Regards,

N. Bhushan Mandava

N. Bhushan Mandava
Agent for AgValue-Clopyr, LLC

SEP 11 2002

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs

AGVALUE-CLOPYR, LLC
C/O MANDAVA ASSOCIATES
1730 M STREET, N.W. SUITE 906
WASHINGTON, DC 200364512

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your transmittal of 09/03/02. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your data submittal was found to be partially in compliance with the standards for submission of data contained in PR Notice 86-5, with the exceptions noted below. A copy of your transmittal bibliography is enclosed, annotated with the Master Record ID's (MRIDs) assigned to each document accepted. Please use these numbers in all future references to these documents. If deficiencies were found which apply to individual accepted studies, they are listed below following the applicable MRID. Any document which has been assigned a MRID has been accepted under PR Notice 86-5. If any comments related to a MRID appear on this report, they are provided for your information and reference when preparing future submissions. Some individual documents were not acceptable, and all copies are being returned to you for correction for the reasons indicated below. These rejected studies have been assigned separate identification numbers which are annotated on both the enclosed bibliography and the rejected document labels. The rejected studies and their deficiencies are described below.

Rejected study [01] :

* Judging from the pagination of the study,
pages. were omitted from the submitted copy.

186 in the confidential attachment

MANDAVA ASSOCIATES

CONSULTANTS IN SCIENCE, TECHNOLOGY AND REGULATORY AFFAIRS

1730 M STREET, N.W., SUITE 906, WASHINGTON, DC 20036-4512

TELEPHONE: (202)-223-1424/1747 · TELEFAX: (202)-223-0141 · E-Mail: mandava@compuserve.com

Hand Delivered

August 28, 2002

Ms. Joanne I. Miller
Product Manager 23
Herbicide Branch
Registration Division (7504C)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Washington, D.C. 20460

75147-G

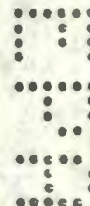
SUBJECT: ME-TOO Application for Registration for AgValue CLOPYRALID
TECHNICAL
Active Ingredient: Clopyralid
EPA Chemical Code: 117403
Company Name: AgValue-Clopyr, LLC
Company Number: 75147

Dear Ms. Miller:

On behalf of AgValue-Clopyr, LLC, we are submitting a ME-TOO application for the registration of AgValue CLOPYRALID TECHNICAL which is the trade name for clopyralid technical.

In support of the application for the subject product registration, we are providing the following administrative materials and product chemistry data on AgValue CLOPYRALID TECHNICAL"

- 1) Authorization Letter designating us as an Agent
- 2) Application for Pesticide Registration
- 3) Confidential Statement of Formula
- 4) Certification with Respect to Citation of Data
- 5) Data Matrix
- 6) Five Copies of Draft Labeling for the Subject Product



- 7) Volume 1: AgValue CLOPYRALID TECHNICAL: Group A - Product Identity, Composition, and Analysis. Product Properties Data in Support of FIFRA Registration. Data Requirement: 40 CFR 158.155-180; OPPTS Test Guidelines 830.1000-1900; OPP Guideline Series 61 and 62 (Project No.: AVI-CLOPYR TECH-PC-1); AgValue-Clopyr, LLC
REJ(Φ1)
- 8) Volume 2A: AgValue CLOPYRALID TECHNICAL: Group A - Product Identity, Composition, and Analysis. Product Properties Data in Support of FIFRA Registration. Data Requirement: 40 CFR 158.155-180; OPPTS Test Guidelines 830.1000-1900; OPP Guideline Series 61 and 62 (Project No.: AVI-CLOPYR TECH-PC-2); AgValue-Clopyr, LLC
457515Φ1
- 9) Volume 2B: Clopyralid Technical: Chemical Characterization of a Test Substance to Determine Amounts of Active Ingredient (OPPTS Series 830 Sections 1700); Stillmeadow Laboratory Study Number 6824-01; AgValue-Clopyr, LLC
457515Φ2
- 10) Volume 3A: AgValue CLOPYRALID TECHNICAL: Group B - Physical and Chemical Properties. Product Properties Data in Support of FIFRA Registration. Data Requirement: 40 CFR 158.190; OPPTS Test Guidelines 830.6302-7950; OPP Guideline Series 63 (Project No.: AVI-CLOPYR TECH-PC-3); AgValue-Clopyr, LLC
457515Φ3
- 11) Volume 3B: Clopyralid Technical: Product Chemistry: Technical Grade Product (OPPTS Series 830 Sections 6302, 6303, 6304, 6313, 6314, 6315, 6325, 7000, 7200, 7300, 7570 and 7840); Stillmeadow Laboratory Study Number 6825-01; AgValue-Clopyr, LLC
457515Φ4

This product chemistry data was developed by AgValue-Clopyr, LLC in support of the application for registration for the subject product.

Please also note that AgValue-Clopyr, LLC is relying on the safety data submitted by other registrants on clopyralid. In accordance with the regulations under 40 CFR Part 152, the applicant has:

- 1) Notified all persons listed in "Data Submitters List" regarding his intention to apply for the subject registration and with an offer to pay compensation for the applicable data to the extent required by FIFRA section 3(c)(1)(D); and,

Ms. Joanne I. Miller
August 28, 2002

Page 3

- 2) Selected "cite-all" method of support and general offer to pay (EPA Form 8570-34 and EPA Form 8570-350).

In addition to the above studies, we are also relying on other items of data on the subject product in the Agency's files.

We are requesting an "Expedited Review" in accordance with FIFRA Section 3(c)(3)(b)(i), because our product (AgValue CLOPYRALID TECHNICAL) is substantially similar or identical in composition and labeling to Lontrel T (EPA Reg. No.: 464-613) which contains 95% clopyralid as an active ingredient.

Since we have fulfilled all the registration requirements, we request you grant the registration for the subject product, so that the applicant can market it for the next growing season.

Sincerely,

N. Bhushan Mandava

N. Bhushan Mandava, Ph.D., RAC
Agent for AgValue-Clopyr, LLC

Enclosure

cc: Brian Heinze

